



United States Department of the Interior

Office of Aviation Services

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Boise, Idaho 83706-3991

Memorandum

November 12, 2015

To: Matthew Elliott, Assistant Inspector General for Investigations

From: Mark L. Bathrick, Director, Office of Aviation Services (OAS) **MARK BATHRICK**

Subject: OAS Response to Management Advisory of Investigative Results, Bureau Action and Response Required memo dated August 20, 2015

Digitally signed by MARK BATHRICK
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Date: 2015.11.12 09:43:47 -0700

OAS appreciates your efforts to ensure fair practices are established and in good working order throughout the Department. We take great pride in our work that routinely consists of hundreds of contracted operations among a wide variety vendors working in partnership with various agencies throughout the world. Our long standing success in this area is well documented as evidenced by our ISO 9001:2008 certification and is viewed as a model from many other federal and state agencies. The goal in revising the Aviation Life Support Equipment Handbook (ALSE) was to update its contents and ensure that Personal Protective Equipment (PPE) requirements were adequate for Departmental and its partner agencies aviation operations. We will take appropriate action to ensure our standard of quality remains intact however the following elements we request for additional consideration in your investigation:

1. The revised ALSE Handbook revision is still in draft t and has not finished its review process and therefore, was never approved nor implemented. The draft was distributed among internal DOI and USFS stakeholders for comment. We are fully prepared to handle the issues and possess significant experience in handling matters related to solicitations and awards.
2. Adopting other agencies criteria (DoD and DHS in this case) allowed us to glean knowledge from the world's leading experts which the Department doesn't possess nor is funded to develop/maintain. This removes needless duplication of programs and is an example of good government. Additionally, these other agencies vetted these standards and helmets through a rigorous competitive process of their own. Although we are sensitive to vendors who desire to sell products and services to us, we cannot staff appropriately to review and certify their performance ratings as appropriate for our Department employees.
3. This is a novel approach to establishing standards for a vital component of PPE within an industry that lacks any guidance from any regulatory agency or industry consortium. There's been a dramatic increase in the number of helmet models available in the market with unknown performance properties. There's also been a significant increase in the use of surplus, obsolete rigid helmet earcups that prevent side impact attenuation. The intent in the ALSE handbook revision was to establish the same standards of the aforementioned agencies to ensure a similar level of protection under which those

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government personnel benefit. A recent article in a widely respected publication affirms the difficulty of this endeavor and the recommendations from industry coincide with our approach to involving the United States Army Aeromedical Research Laboratory (USAARL) as a testing center for those manufacturers that are willing to submit for testing:

http://www.aviationtoday.com/rw/issue/features/Top-Cover_86081.html#.VhfmcU8Vi0J

In response to the recommendations contained in the memo, OAS will take the following actions:

1. OAS will rescind the 1992 memorandum concurrently with the publication of the revised (approved) Handbook.
2. OAS Safety is currently working with the United States Army Aeromedical Research Laboratory (USAARL) to develop a working relationship that would identify them as our preferred testing laboratory. This relationship would facilitate the process for manufacturers to enter into an agreement with USAARL to test their helmet models. USAARL is unquestionably recognized as the leading research lab when it comes to helmet technology. This discussion with USAARL is ongoing as they are determining their capacity for testing.
3. The revised Handbook and agreement with USAARL will communicate that OAS does not require nor will not accept any proprietary information. OAS will only require a letter from the recognized testing center validating that it met (or failed to meet) the applicable standard(s).
4. Although the Accident Prevention Bulletin was removed from the OAS website, it was replicated on a number of sites. OAS will advise other parties as known that we have removed the Accident Prevention Bulletin and provide a revised version without proprietary information.
5. OAS Safety will ensure that all data solicited from, or provided by, the aviation industry is vetted for accuracy and free of any advertising rhetoric prior to incorporating the language into publications.
6. Once approved, OAS will publish a list of the helmet models that have met the ALSE handbook standards in manner that affords frequent updates.
7. OAS has already received a substantial amount of feedback at various industry trade shows and will continue that practice in the future.

Thank you for your interest in DOI aviation safety. Please contact Keith Raley, Chief, Aviation Safety, Training, and Program Evaluations Division at 208-433-5071 or keith_raleigh@ios.doi.gov if you have further questions or concerns.