Sun Path Products Inc. Final Report; Service Bulletin SPSB006

September 21, 2011

Scope:

On March 22\textsuperscript{nd} 2011 Sun Path Products Inc. issued service bulletin SPSB006 revoking installation approval of the Aviacom SA/NV Argus Automatic Activation Device. This letter is the final report on this matter and the final decision of Sun Path regarding future installation approval of the ARGUS AAD.

SPSB006 Final Report:

Since publication of SPSB006, Aviacom SA/NV has failed to provide the TSO approval holders (Harness/container manufacturers) with an adequate root cause analysis of all 6 reported failures of Argus AAD’s to completely cut the reserve closing loop. Additionally, corrective action to effectively address and mitigate any future failures has not been provided. After a lack of satisfactory communication from Aviacom to the harness/container manufacturers, a meeting was scheduled on August 25\textsuperscript{th} in St. Louis MO. This meeting was called to bring all interested and/or affected harness/container manufacturers together with all AAD manufacturers to include Aviacom. Investigators from the Polish Aviation Authorities and Kirk Smith from Para-Concepts were present as well. During this meeting Aviacom and Kirk Smith were given the opportunity to present all data and resultant action. The minimal test data that was presented again was speculative, incomplete and lacked any definitive answers or conclusions other than they “think” they have a better cutter due to an upgrade to the hardness of the cutter.

\textit{(Please note that there was no specification for hardness on the cutters manufactured previous to Sept 2007. This is a critical aspect of any metal cutter.)}

Outcomes from the August 25\textsuperscript{th}, 2011 meeting are as follows:

1. Aviacom has been purchasing a modified commercial off the shelf, pyrotechnic reefing cable cutter from Chemring Energetics UK as a sub component for use with the ARGUS AAD assembly. Since these failures to cut in this life saving application have become public, Chemring Energetics UK has stopped sale of these cutters to Aviacom. As a result, Aviacom reports that they have approximately 200 post 2007 cutters available for both testing/verification and for fielded customer units. Further, Aviacom has no ability to institute higher or acceptable quality control practices as they do not manufacture the cutter and Chemring Energetics UK refuses to modify any internal processes for this cutter as this cutter is designed and intended for alternate purposes other than parachute automatic activation devices.
2. Aviacom has admitted that their cutter design has serious deficiencies; however they have continued to allow use of substandard cutters due to their inability to provide viable replacement cutters. Furthermore, Aviacom refuses to develop a new cutter design claiming the cost to do so would be in excess of corporate resources. Aviacom is not willing to make a capital investment to develop a new cutter, which has acceptable reliability levels.

3. Aviacom has officially stopped production of the ARGUS AAD and has informed the industry that they are officially out of business. Aviacom claims that service centers will continue to provide maintenance for an undisclosed amount of time and pre September 2007 cutters will be replaced at no charge until their stock is depleted. (note that the limited supply of cutters critically impacts the ability to test and provide adequate quality assurance for those remaining cutters being provided)

In light of facts provided to the harness/container manufactures and the attendees of the August 25th, 2011 meeting, those of which are outlined above, we feel that any further installation approvals for the ARGUS AAD will be unnecessary. The cutters proven deficiencies, lack of cutter subassemblies for additional statistical analysis and testing and the inability to maintain customer-fielded units are the reasons for discontinued installation approval of the ARGUS AAD. It is the final decision of Sun Path Products, Inc., that no further installation approvals will be granted. The installation of the ARGUS AAD in any Sun Path Products, Inc. harness/container system is disapproved permanently and will not be reinstated.

Sun Path Products takes skydiver safety very seriously and did not reach these conclusions without careful analysis. Feel free to contact Sun Path with questions or concerns at 910.875.9002 or info@sunpath.com

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