

# EXHIBIT E



**DEPARTMENT OF THE AIR FORCE**  
HEADQUARTERS 88TH AIR BASE WING  
WRIGHT-PATTERSON AIR FORCE BASE OHIO

April 15, 2022

88 CS/SCSIF  
3810 Communications Blvd  
Wright-Patterson AFB OH 45433-5767

Dana Miller  
MotleyRice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464

Dear Dana Miller

This is an interim response to your January 13, 2022 Freedom of Information Act (FOIA) requesting: "See requested items on page three of this memo (29 requested items)". The FOIA control number for your request is 2022-01903-F ST5

Due to the current situation regarding COVID-19, the Freedom of Information Act (FOIA) Office will be minimally manned until further notice. FOIA managers will be teleworking and will continue to process your request to the best of their capability; however, we expect delays in response times. We appreciate your patience and understanding. We will notify you once the office is back to normal operations. Until our return to the office an initial determination will be provided at a later date.

We find we are unable to meet the time limits imposed by the FOIA in this instance because all or part of the responsive records are not located at this installation and other Air Force activities need to be involved in deciding whether or not to release the responsive records

We expect to reply to your request as an estimated delivery is approximately August 2022.

If you disagree and interpret this response as an adverse action, you may write to the Secretary of the Air Force, Thru: 88 CS/SCSIF, 3810 Communications Blvd, Wright-Patterson AFB, OH 45433-7802, within 90 calendar days from the date of this letter. Include in the appeal your reasons for reconsideration, and attach a copy of this letter. You may also submit your appeal on line at the Air Force's Public Access Link: <https://efoia.cce.af.mil/>.

You may contact the Air Force FOIA Public Liaison Officer, Ms. Anh Trinh, concerning this final response at Air Force FOIA Public Liaison Office (SAF/CN), 1800 Air Force Pentagon, Washington, DC 20330-1800 or [DAF.FOIA@us.af.mil](mailto:DAF.FOIA@us.af.mil) or (703) 614-8500. You may also seek dispute resolution services from the Office of Government Information Services, and can find information on this Office at <https://www.archives.gov/ogis/mediation-program>. Using the dispute resolution services, will not affect your appeal rights.

The point of contact in our office is Ms. Renee Kaffenbarger, and can be reached via email at [renee.kaffenbarger@us.af.mil](mailto:renee.kaffenbarger@us.af.mil) or the FOIA Office email at [wpafb.foia@us.af.mil](mailto:wpafb.foia@us.af.mil). It is a pleasure serving you.

Sincerely

A handwritten signature in black ink that reads "Renee Kaffenbarger". The signature is written in a cursive style with a large initial "R".

RENEE KAFFENBARGER, Civ, DAF  
Freedom of Information Act Analyst

1 Atch  
Original Request

**Original Request: 2022-01903**

**Requests:**

- 1) All documents related to the AFRL's analysis to determine whether the six (6) power metal-oxide-semiconductor field-effect transistors (MOSFET) in the incident DRS were counterfeit.
- 2) All documents related to the AFRL's analysis to determine why SMD capacitor C262 was partially dislodged from its solder pads, and whether it was damaged during the installation or removal of the Printed Wire Board (PWB). If this analysis did not occur, please state as such.
- 3) All documents related to the AFRL's analysis to determine why the power MOSFETs contained "arcing scratch marks", and why they were "heavily gouged", and why the leads had "deep horizontal grooves".

- 4) All documents related to why Teledyne Defense Electronics replaced the ADXL250AQC (U41) chip mounted on the PWB of the Dual Axis Accelerometer after the accident.
- 5) All documents related to Teledyne Defense Electronics' authorization to replace the ADXL250AQC (U41) chip mounted on the PWB of the Dual Axis Accelerometer after the accident.
- 6) All documents related to the AFRL's analysis to determine whether the incident ADXL250AQC (U41) chip mounted on the PWB of the Dual Axis Accelerometer and the replacement (U41) chip were counterfeit.
- 7) All documents related to the AFRL's analysis to determine whether Parallel Flash Memory chip U73 was counterfeit.
- 8) All documents related to the AFRL's analysis to determine whether the three (3) Serial Flash Memory chips, U58, U76, and U94 were counterfeit, and why they contained "blacktopping", "ghost markings" and lacked conformal coating.
- 9) All documents related to the AFRL's analysis of any other components of the incident DRS not identified in the PowerPoint titled "Digital Recovery Sequencer", dated 3 Aug 2020, Tab EE of the AAIB Report.
- 10) All documents related to the AFRL's destructive analysis of components within the incident DRS unit.
- 11) All documents related to the AFRL's destructive analysis of components within other exemplar DRS units.
- 12) All documents related to the AFRL's analysis as to whether the presence of the counterfeit parts in the DRS (as identified in the PowerPoint titled "Digital Recovery Sequencer", dated 3 Aug 2020) would result in operational failure of the ACES-II ejection seat.
- 13) All documents related to the USAF's knowledge that "counterfeit components in the Department of Defense (DoD) inventory have been an ongoing problem over the past few decades".
- 14) All documents related to the quality assurance processes that were used by the USAF to ensure that Teledyne Defense Electronics did not utilize counterfeit components in F-16 ejection seat DRS units.
- 15) All documents related to the Air Force Lifecycle Management Center awareness that DRS units contained counterfeit components.
- 16) A copy of the USAF/government contract that obligated Teledyne Defense Electronics to supply DRS units.
- 17) All documents related to the analysis as to whether other exemplar DRS units contained counterfeit parts.

- 18) All documents in possession of the USAF related to the analysis or testing of the incident DRS, or exemplar DRS units, by Teledyne Defense Electronics, or any other third party.
- 19) All documents related to the AFRL's simulated ejection, loading of an exemplar DRS unit's serial flash with data, de-soldering the serial and parallel flash to recover simulated ejection data, downloading of the incident DRS channel 2 parallel flash memory contents (U73), attempt to recover parallel flash data using reader tool, and the comparison of the incident data to the exemplar data.
- 20) Identify the current location and material condition of the incident DRS.
- 21) For the period of the last ten years, we request the average time required for the USAF to complete an AAIB Report involving a fatality.
- 22) For the period of the last ten years, we request the average time required for the USAF to complete a Safety Investigation Board (SIB) Report involving a fatality.
- 23) All documents related to any additional or ongoing investigations into DRS failures after the AAIB Report and SIB Report concerning the 30 June 2020 F-16CM crash were completed.
- 24) All documents related to the "quality evaluation (QE) testing" of the ACES II Digital Recovery Sequencer (DRS) by "Hill AFB CAD/PAD" in December 2017 and August 2018, and documents pertaining to any testing was completed during any other dates.
- 25) All correspondence between the Air Force Life Cycle Management Center and Teledyne Defense Electronics regarding testing
- 26) Confirm that the organization that granted the incident DRS's three service life extensions was the same organization that drafted the report titled, "Analysis of Escape System" in Tab J of the AAIB.
- 27) All documents that directed AFRL's involvement in the analysis of the incident DRS.
- 28) All documents that AFRL relied upon to support the assertion that the presence of counterfeit parts in the incident DRS would not necessarily result in operational failure of incident ACES-II ejection seat system;
- 29) All documents that AFRL relied upon to support the assertion that there is no evidence that any of the suspect counterfeit components in the incident DRS were causal in the failure of the incident ACES-II ejection seat system;