The following compilation of recommendations, spanning several years and iterations of the FAA's oversight responsibilities, illustrates the breadth and depth of concerns raised about the FAA's approach to air safety.

The FAA should:

1. Insist on more comprehensive design reviews of major aircraft and engine certification. Aircraft should be reviewed holistically—looking for risks, not only singly, but in combination;

2. Expand its approval authority over design criteria;

3. Improve its policies to ensure that the agency is properly complying with regulations concerning oversight of designee programs;

4. Create a database with information on designees' activities and performances;

5. Develop intervention mechanisms to ensure coherence in regulatory practices across the agency;

6. Protect the Voluntary Disclosure Program, which is vitally important to the future of aviation safety;

7. Require a full two-year transition to unit member self-selection. That is, it should take two years until the company has full control over the hiring of someone with certification power;

8. Develop guidance on the process to remove an Organization Designation Authority (ODA) unit member and require all ODA holders to use this process in their ODA procedures and manuals;

9. Track unit member appointments in a database in order to identify unit members with known performance issues and require engineers to cross-check names with said database beyond the first two-year required timeframe;

10. Develop training for FAA engineers and disseminate comprehensive procedures on the new oversight structure for large ODA holders;

11. Determine what additional model inputs and labor distribution codes are needed to identify ODA oversight staffing needs;

12. Develop and implement a system-based evaluation criteria and risk-based tools to aid ODA team members in targeting their oversight;

13. End all industry Aviation Rulemaking Advisory Committees that currently violate the Federal Advisory Committee Act (FACA), which protects against secretive, back-door lobbying of agencies by requiring public representatives on all federal advisory committees;

14. End self-regulation of new aircraft certification by requiring that there be an independent review of key safety systems by experts not working for the regulated party or the FAA. To facilitate this, the FAA should hire more experts as employees and consultants to lessen dependence on and oversee regulated-party employees;

15. Require that delegated FAA certification and inspection officials be chosen by the FAA, not the regulated party, and that such officials take an oath of office and enjoy civil service and whistleblower protections. Delegated Officers should be required to sign approvals under penalty of perjury as to truthfulness and lack of undue pressure from or conflict of interest with the regulated party. FAA oversight official should do the same and there should be prompt audits of suspicious activity;

16. Expand the use of its Aviation Rulemaking Advisory Committee (ARAC) to include the review of safety regulations and policies that are requested by three or more members, rather than only the items requested by the FAA;

17. Expand ARAC membership to include representatives of safety manufacturers, academics who have studied air safety, and the medical profession with expertise in occupational and other medical hazards of air travel;

18. Pay non-industry members of ARAC and working groups for travel and per diem to facilitate the attendance of meetings;

19. Restrict the grandfathering of exemptions from safety regulations for existing aircraft designs to a reasonable time limit—no more than 5 years;

20. Publicly disclose all FAA decisions that grant safety waivers;

21. Request a sufficient budget to allow it to fulfill its regulatory obligations;

22. Realign incentives to prioritize thoroughness and safety over economy and efficiency;

23. Approve compliance with the regulation based on a determination of the extreme improbability of a critical hazard. It should not be approved by a Designated Engineering Representative (DER);

24. Establish a formalized, intensive, spot-checking system for evaluating DER performance; and

25. Enforce greater accountability for DERs, including creating criteria for termination for cause and deterrent sanctions for abuse of the DER system.