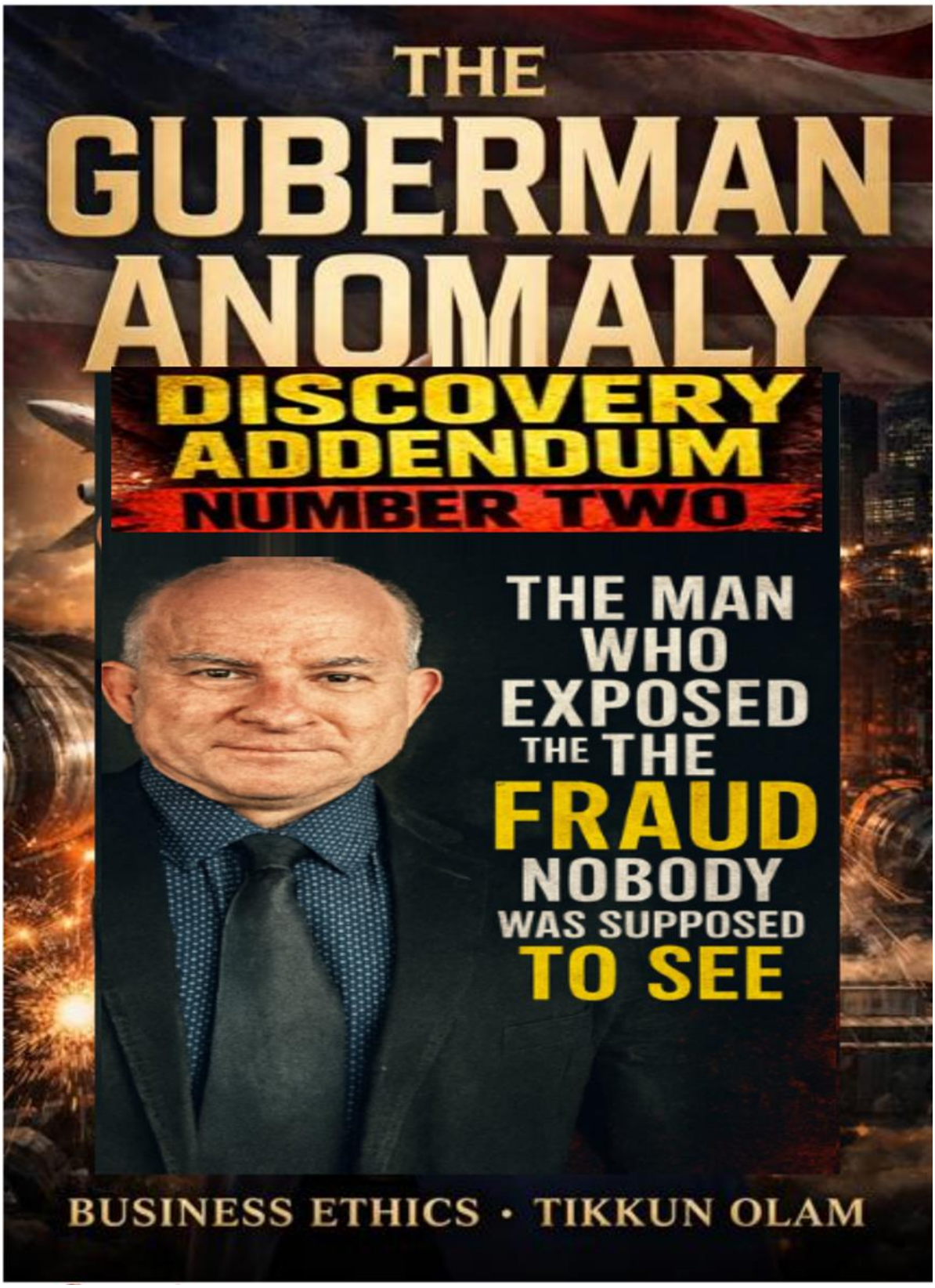
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NUMBER TWO
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GUBERMAN ANOMALY — DECLARATION OF AUTHENTICITY

Addendum to Press Release and Formal Correspondence
February 23, 2026

I, Daryl Guberman, CEO of Guberman PMC LLC, hereby declare the following:

I affirm that all documents, excerpts, evidence, and materials contained within this addendum — including the press release, the attached correspondence, and the supporting exhibits — are authentic, official, and collected over time through direct professional experience, preserved records, and publicly accessible sources.

This addendum represents only the beginning of the documented evidence in my possession. It is not exhaustive. It is a curated selection of materials relevant to the structural issues raised in my formal communications.

For more than 40 years, I have worked within the fields of:

- Aerospace quality systems
- Medical implant manufacturing
- Advanced materials and metals
- Printing and labeling
- Plastics and distribution
- Global supply-chain oversight

For the past 15 years, I have operated my own company — Guberman PMC LLC — which carries my family name. Because of that, I state clearly and unequivocally:

I will not disparage, defame, or discredit my family name, my family, or my person. Every statement and document provided herein is presented truthfully, accurately, and in good faith.

This declaration is made on February 23, 2026, with full responsibility for the accuracy and integrity of the materials submitted.

Daryl Guberman
CEO, Guberman PMC LLC
Systemic-Risk Advisor | Forensic Archivist | 40-Year Quality-Systems Expert
Boeing Shareholder

Section C- Descriptions/Specifications/Statement of Work

C-001 STATEMENT OF WORK

SERVICE/LABOR CATEGORY DESCRIPTIONS

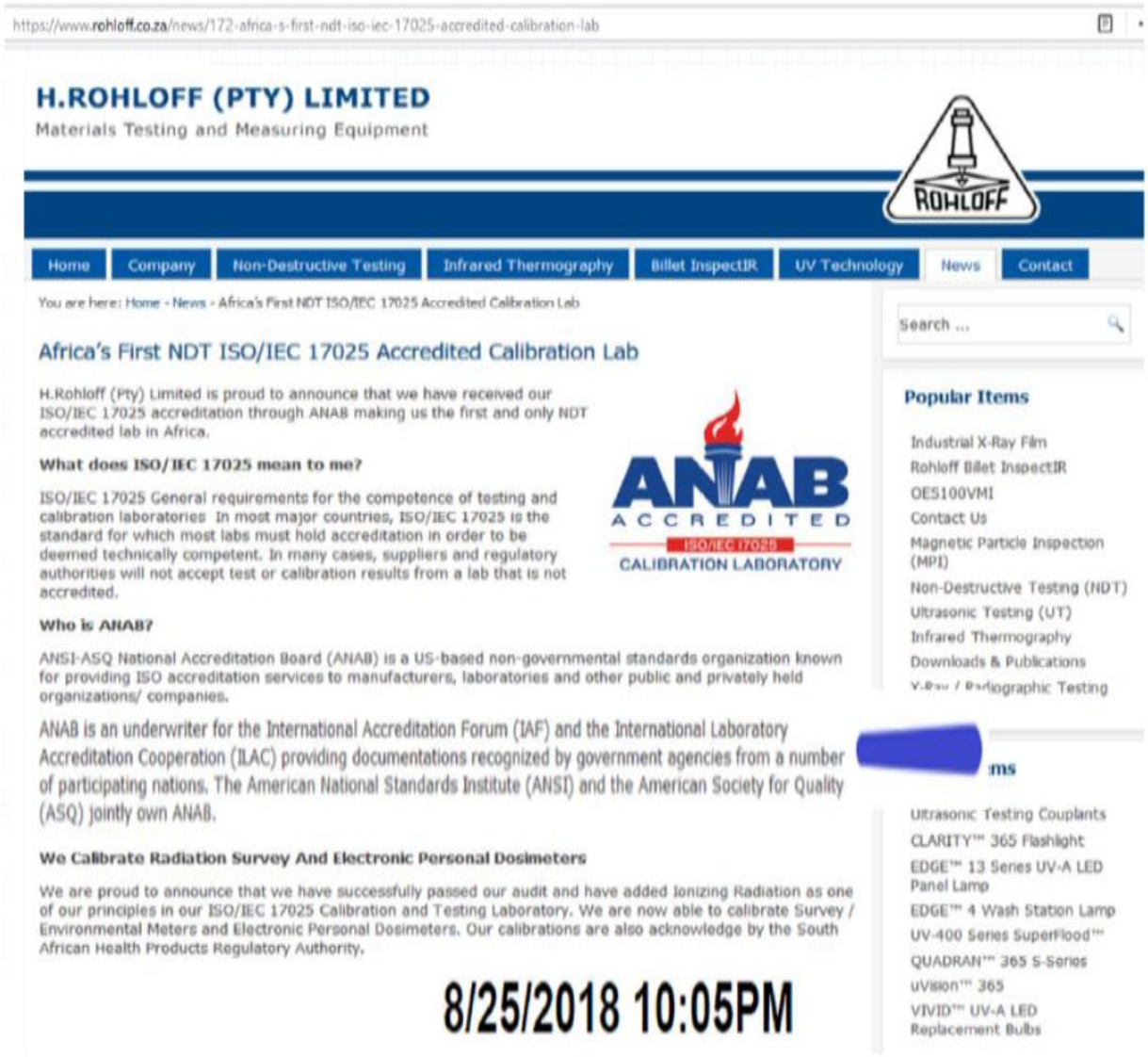
The Bureau of the Comptroller and Global Financial Services (CGFS) located at 1969 Dyess Ave, Charleston, SC has a requirement to maintain its ISO-9001:2015 certification. This certification is achieved via recertification and surveillance audits conducted by an ISO-9001:2015 certification body. A quality management system (QMS) has been developed and deployed at the following six CGFS locations:

- Charleston, South Carolina
- Bangkok, Thailand
- Manila, Philippines
- Paris, France
- Sofia, Bulgaria
- Washington, DC

The CGFS QMS was originally developed, deployed and then certified in Charleston, South Carolina during December 2008. This main operation is comprised of eighteen different functional offices of which each provides a unique service to its customer base. Since that time, CGFS has expanded its QMS program to its satellite operations which include all domestic and overseas locations. Over the years, CGFS QMS has undergone several business and process changes in support of its continuous improvement initiatives. The attached six applicability matrices outline which clauses apply to which location under our global certification. Note: These matrices represent the latest level of certification, which is to ISO-9001:2015 Standard.
In order to maintain the ISO-9001:2015 certification, all of the CGFS operations must be audited annually by an outside third party registrar to assess the QMS effectiveness and compliance to the ISO Standard. The ISO Accreditation body is: ANSI-ASQ National Accreditation Board (ANAB). ANAB is an underwriter for the International Accreditation Forum (IAF).

ANSI-ASQ National Accreditation Board (ANAB) ANAB is an underwriter for the International Accreditation Forum (IAF)

https://www.rohloff.co.za/news/172-africa-s-first-ndt-iso-iec-17025-accredited-calibration-lab



https://www.rohloff.co.za/news/172-africa-s-first-ndt-iso-iec-17025-accredited-calibration-lab

H.ROHLOFF (PTY) LIMITED

Materials Testing and Measuring Equipment

ROHLOFF

Home | Company | Non-Destructive Testing | Infrared Thermography | Billet InspectIR | UV Technology | News | Contact

You are here: Home - News - Africa's First NDT ISO/IEC 17025 Accredited Calibration Lab

Search ...

Africa's First NDT ISO/IEC 17025 Accredited Calibration Lab

H.Rohloff (Pty) Limited is proud to announce that we have received our ISO/IEC 17025 accreditation through ANAB making us the first and only NDT accredited lab in Africa.

ANAB ACCREDITED ISO/IEC 17025 CALIBRATION LABORATORY

What does ISO/IEC 17025 mean to me?

ISO/IEC 17025 General requirements for the competence of testing and calibration laboratories In most major countries, ISO/IEC 17025 is the standard for which most labs must hold accreditation in order to be deemed technically competent. In many cases, suppliers and regulatory authorities will not accept test or calibration results from a lab that is not accredited.

Who is ANAB?

ANSI-ASQ National Accreditation Board (ANAB) is a US-based non-governmental standards organization known for providing ISO accreditation services to manufacturers, laboratories and other public and privately held organizations/ companies.

ANAB is an underwriter for the International Accreditation Forum (IAF) and the International Laboratory Accreditation Cooperation (ILAC) providing documentations recognized by government agencies from a number of participating nations. The American National Standards Institute (ANSI) and the American Society for Quality (ASQ) jointly own ANAB.

We Calibrate Radiation Survey And Electronic Personal Dosimeters

We are proud to announce that we have successfully passed our audit and have added Ionizing Radiation as one of our principles in our ISO/IEC 17025 Calibration and Testing Laboratory. We are now able to calibrate Survey / Environmental Meters and Electronic Personal Dosimeters. Our calibrations are also acknowledge by the South African Health Products Regulatory Authority.

8/25/2018 10:05PM

Popular Items

- Industrial X-Ray Film
- Rohloff Billet InspectIR
- OES100VMI
- Contact Us
- Magnetic Particle Inspection (MPI)
- Non-Destructive Testing (NDT)
- Ultrasonic Testing (UT)
- Infrared Thermography
- Downloads & Publications
- Y-Ray / Radiographic Testing

ms

- Ultrasonic Testing Couplants
- CLARITY™ 365 Flashlight
- EDGE™ 13 Series UV-A LED Panel Lamp
- EDGE™ 4 Wash Station Lamp
- UV-400 Series SuperFlood™
- QUADRAN™ 365 S-Series
- uVision™ 365
- VIVID™ UV-A LED Replacement Bulbs

ANAB is and underwriter for the International Accreditation Forum (IAF) and the International Laboratory Accreditation Cooperation (ILAC) providing documentations recognized by government agencies from a number of participating nations. The American National Standards Institute (ANSI) and the American Society for Quality (ASQ) jointly own ANAB

THE LINK IS LIVE ON THIS DATE: 2/24/2026 12:50 PM

https://www.crown.co.za/images/LatestNews/AfricanFusion/H_Rohloff_NDT.pdf

Calibration essential for accurate, safe and traceable NDT

This article, extracted from a paper delivered by Yvette Volschenk on behalf of H. Rohloff at the SAINT NDT conference earlier this year, highlights the importance of calibrating NDT equipment to achieve the full safety and traceability benefits of the technology.

Effective non-destructive testing (NDT) is reliant on two main factors, namely the equipment and the operator using the equipment. "The simple fact is that NDT saves lives and using non-compliant equipment can lead to incorrect reporting of results, which in turn can lead to disaster," begins Volschenk.

"An operator is reliant on the information from the NDT equipment and, therefore, it is critical that the NDT equipment used meets international standards. It is of the utmost importance that NDT equipment is calibrated through an ISO/IEC 17025 accredited laboratory that is able to confirm the equipment's compliance," she says.

H.Rohloff operates an ANAB-accredited ISO/IEC 17025 calibration laboratory in Protea Ridge in Krugersdorp, which is the first and only such laboratory on the African continent. "In most major countries, ISO/IEC 17025 is the standard to which most labs must hold accreditation in order to be deemed technically competent and, in many cases, suppliers and regulatory authorities will not accept test or calibration results from a lab that is not accredited," she adds.

Who is ANAB? The ANSI-ASQ National Accreditation Board (ANAB) is a US-based non-governmental standards organisation known for providing ISO accreditation services to manufacturers, laboratories and other public and privately held organisations and companies.

ANAB is an underwriter for the International Accreditation Forum (IAF) and the International Laboratory Accreditation Cooperation (ILAC), providing documentation recognised by government agencies from a number of participating nations. The American National Standards Institute (ANSI) and the American Society for Quality (ASQ) jointly own ANAB.

General competence requirements

ISO 9001 is a standard designed for the manufacturing and service sectors and focuses the implementation of quality management systems in companies operating in these sectors.

ISO 17025 focuses on calibration and testing, but there are many similarities in the quality management system incorporated in both of these ISO standards. There are some key difference between ISO 17025 and ISO 9001, however.

ISO 17025 requires a demonstration of technical competence. It is required of management to authorise specific personnel to perform particular types of sampling, test and/or calibration tasks; to issue test reports and calibration certificates; and to ensure technical competency of the personnel performing each task.

ISO 17025 requires traceability of measurements to standards. For accredited calibration laboratories, the programme for calibration of equipment has to be designed and operated so as to ensure that calibrations and measurements made by the laboratory are traceable.

The 17025 standard also requires the application of measurement uncertainty. The calibration certificates issued by these laboratories not only contain the measurement results, they also include the measurement uncertainty and/or a statement of compliance with an identified metrological specification.

An ISO/IEC 17025 accredited test report and calibration certificate is regarded as a legal document, so the use of an ISO/IEC 17025-accredited calibration laboratory is preferred to an ISO 9001-certified company.

All accreditation bodies that grant ISO/IEC 17025 accreditation are approved by ILAC (ilac.org) against ISO/IEC 17011:2017, which specifies the requirements for the competence, consistent operation and impartiality of accreditation bodies assessing and accrediting conformity assessment bodies.

NDT Equipment such as that used for magnetic particle inspection for detecting crack and surface defects, must be calibrated through an ISO/IEC 17025 accredited laboratory that is able to confirm the equipment's compliance.

Accreditation bodies operating in Africa include: SANAS, our local accreditation system; and NATA, UKAS, DAkkS, A2LA and ANAB, which are all International bodies. H.Rohloff uses the international accreditation body, ANAB from the USA, which is recognised in Africa via an ILAC mutual recognition agreement (MRA). These are international agreements through which two or more countries agree to recognise one another's conformity assessments.

Established in 1946, H.Rohloff (Pty) Limited has become the first ISO/IEC 17025 accredited calibration laboratory and is also certified to ISO 9001:2015.

Rohloff is synonymous with high quality, technology-driven materials testing and measuring equipment, systems and solutions. Its products are used throughout industry and deliver productivity, quality and safety for customers.

"We seek to provide sound advice and services, sound equipment and sound calibrations, which are the cornerstones of our triangular company logo," Volschenk concludes, adding, "and to reinforce these objectives and to ensure customer satisfaction, we strive to continually improve our quality systems."

Response to Questions for Solicitation 19AQMM18R0131

1. Will the State Department consider a submittal responsive without the IAF and ANAB accreditations at time of proposal submission?

   Answer: **No**. At the time the proposal is submitted the Contractor shall be accredited to ISO 17021-1:2015 by a U.S. based accreditation body that is a member of the International Accreditation Forum (IAF) whose accredited scope includes ISO9001:2015 quality management system certification.

2. References to ANSI-ANAB must be changed as they unfairly and unnecessarily limit competition.

   Answer: The Contractor shall be accredited to ISO 17021-1:2015 by a U.S. based accreditation body that is a member of the **International Accreditation Forum (IAF)** whose accredited scope includes ISO9001:2015 quality management system certification.

3. Provide an unredacted copy of the current Certificate of Conformance for EACH standard. Note: Please do not respond that this information will be provided post-award or that it is subject to FOIA. This information must be provided upon request and is a public document.

   Answer: See attached.

4. Clarify whether the quantity of personnel stated includes all FTE, PTE, and contracted personnel working within the scope of each certification at each site.

   Answer: Yes – includes all.

5. State the number of auditor days previously used for recertification.

   Answer: The following audit days were used by the registrar (using one auditor) for recertification audits:

Charleston	5.5 Days (5 days on-site + .5 day off-site)
Bangkok	4.0 Days
Manila	3.5 Days (Stage1 = .5 day, Stage2 = 3.0 days)
Paris	1.5 Days (includes limited design for the 1st time)
Sofia	2.0 Days
DC Sites	3.0 Days (includes limited design for the 1st time)

6. State the number of auditor days previously used for surveillance audits.

   Answer: The following audit days were used by the registrar (using one auditor) for surveillance audits:

Charleston	3.0 Days
Bangkok	2.0 Days
Manila	1.5 Days
Paris	0.5 Days
Sofia	1.0 Days
DC Sites	2.0 Days

7. Does the organization have in its possession the previous 3 years of Audit Reports? Yes or No.

   Answer: Yes

8. Does the organization have in its possession the previous 3 years of non-conformances and corrective actions as accepted by the current certification body? Yes or No.

   Answer: Yes

9. State whether semi-annual or annual surveillance audits are required.

   Answer: Annual.

10. State when the organization achieved certification to each of the standards listed.

    Answer: There is only one Standard (ISO-9001:2015) which applies to all locations. Listed below is the most recent certification periods for each location:

    - Charleston, South Carolina - April 27, 2018 to January 15, 2021
    - Bangkok, Thailand - April 27, 2018 to January 4, 2020
    - Paris, France - April 27, 2018 to January 4, 2020
    - Sofia, Bulgaria - April 27, 2018 to July 1, 2019
    - Washington, DC - April 27, 2018 to January 4, 2020
    - Manila, Philippines - April 27, 2018 to April 5, 2019

11. State whether this certification has been continuous without interruption for each standard.

    Answer: Certification has been continuous without an interruption for all locations.

12. Indicate whether Management Review, Internal Audits, and Corrective Action processes are centralized in Charleston OR occur at each site.

    Answers:

    a) Management Review: This process is centralized in Charleston but all location managers participate in certain aspects of the process indirectly as necessary.
    b) Internal Audits: The internal audit program is managed and centralized in Charleston even though we have a dedicated internal audit team located in Bangkok, Thailand.
    c) Corrective Action: The management of the process and database is centralized in Charleston.

13. The table in the Appendix includes a prepopulated number of auditor days. All accredited Certification Bodies must use International Accreditation Forum (IAF) Mandatory Document (MD) 5 to determine audit durations. The durations stated in the Appendix may not be consistent with these mandatory requirements and should be removed.

    Answer: The intent of including a pre-set number estimated audit days by location in the appendix is so that a true cost comparison can be conducted between the various bidders (eliminating this variable within the comparison equation). We understand that the actual audit days will be calculated by the selected auditing firm using the IAF MD 5:2015 mandatory procedure for each location, as stated in paragraph 2.2 of section B.2 of the solicitation.

Department of Energy
Washington, DC 20585

October 29, 2018

Mr. Xiao Jianhua
Chairman of International Accreditation Forum
International Accreditation Forum

Dear Mr. Jianhua:

On behalf of the United States Department of Energy (USDOE) Advanced Manufacturing Office (AMO), I am writing to express my support of the International Accreditation Forum (IAF) "Database of Management System Certifications (Database)." The DOE AMO has made significant investment in the ISO 50001 energy management system standard development and deployment over the past 10 years. Our "50001 Ready" and "Superior Energy Performance (SEP) 50001" programs are designed to accelerate adoption of the ISO 50001 standard. Using a market-based approach we strive to grow the accredited ISO 50001 and SEP certifications. Therefore, the global database being created and sponsored by the IAF is highly complementary of the DOE ISO 50001 strategy.

Our vision is that DOE will publicly recognize on our website US organizations who hold ISO 50001 accredited certifications that are willing to be recognized. We plan to work with ANAB, an IAF Member Accreditation Body, to encourage all ISO 50001 ANAB-accredited Certification Bodies (CBs) to submit certified organization's data to the IAF database. We would also broadly promote to industry the opportunity for voluntary public USDOE recognition on our website of accredited ISO 50001 certified organizations. We believe that ISO 50001 certification recognition by USDOE on our website will serve to motivate and encourage other facilities to seek and achieve ISO 50001 certification and thus help to achieve the energy efficiency objectives of the "50001 Ready" and "SEP 50001" programs.

DOE encourages IAF to move rapidly to initiate the launch of the "Database of Management System Certifications" and encourages IAF ABs and CBs to participate in the data collection of accredited ISO management system certifications.

Please feel free to contact me if you have any questions at paul.scheihing@ee.doe.gov.

Paul Scheihing

Paul Scheihing
Technology Manager
Advanced Manufacturing Office

cc: Gerswynn McKuur, United Nations Industrial Development Organization
Randy Dougherty, IAF Database Management Committee Chair (ANAB)
Lori Gillespie, ANAB
info@iafcertsearch.org

February 17. 2026: DOE/Canada letters to Xiao Jianhua, with red-flagged receipt demand.

Natural Resources Canada | Ressources naturelles Canada

October 30, 2018

Mr. Xiao Jianhua
Chairman of International Accreditation Forum
International Accreditation Forum

Dear Mr. Jianhua,

On behalf of Natural Resources Canada (NRCan), I am writing to express our support of the International Accreditation Forum (IAF) "Database of Management System Certifications (IAF CertSearch)." NRCan has made significant investment in the ISO 50001 energy management system standard development and deployment over the past years. For instance, our cost-shared financial assistance program helps offset the initial cost for organizations to implement ISO 50001. We are also committed to recognizing global leadership in ISO 50001 through our support of the CEM Energy Management Leadership Awards. The IAF global database being created and sponsored by the IAF is highly complementary to our ISO 50001 strategy.

NRCan's vision is that all ISO 50001 certifications and other certifications will be included in the IAF CertSearch global database for the purpose of accurate recording and validation. We plan to work in partnership with the Standards Council of Canada (SCC) and the IAF to encourage all ISO 50001 SCC-accredited Certification Bodies (CBs) to submit certified organization's data to the IAF database. We would also promote to industry, the opportunity for voluntary public NRCan recognition of accredited ISO 50001 certified organizations in the certified trade marketplace that would be embedded within the platform. We believe that the recognition of ISO 50001 certifications by NRCan will serve to motivate and encourage other facilities to seek and achieve ISO 50001 certification and thus help to achieve our national energy efficiency objectives.

NRCan values accredited certification and believes that the IAF CertSearch global database will increase its awareness and integrity, which ultimately, will promote its further acceptance. We encourage IAF to move rapidly to initiate the launch of the "IAF CertSearch" and encourage all IAF Accreditation Bodies and CBs to participate in the data collection of accredited ISO management system certifications.

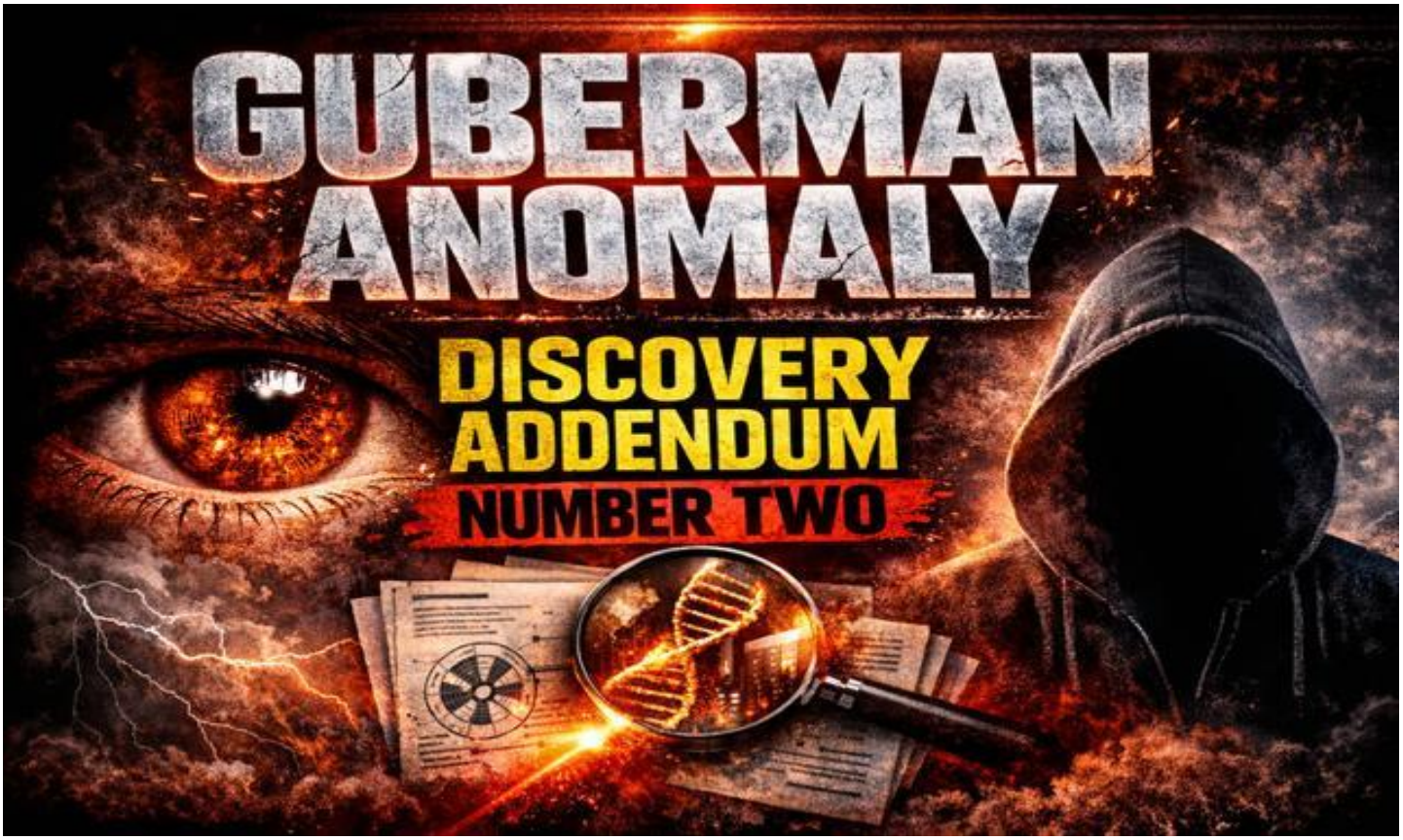
Please feel free to contact me if you have any questions at bob.fraser@canada.ca.

Bob Fraser
Chief, Engineering Support Services
Natural Resources Canada

cc: Gerswynn McKurr, United Nations Industrial Development Organization; g.mckuur@unido.org
Paul Scheihing, United States Department of Energy Advance Manufacturing Office; paul.scheihing@ee.doe.gov
Randy Dougherty, IAF Database Management Committee Chair; rdougherty@anab.org
info@iafcertsearch.com

Canada

February 17. 2026: DOE/Canada letters to Xiao Jianhua, with red-flagged receipt demand.


GUBERMAN
ANOMALY
DISCOVERY
ADDENDUM
NUMBER TWO

GUBERMAN ANOMALY – DISCOVERY ADDENDUM No. 2

Declaration of Authenticity and Technical Basis

March 7, 2026

I, DARYL GUBERMAN, CEO of Guberman PMC LLC, hereby declare that the following addendum is accurate, factual, and submitted with full responsibility for its truthfulness and integrity. The information enclosed reflects my educational background, my professional experience, and the technical basis for the findings contained within the GUBERMAN Anomaly.

Educational Background & Professional Experience (Brief Summary)

My background includes formal training and decades of hands-on work in:

• Aerospace quality systems

• Advanced materials and metals

• National and international oversight

• Patents, distribution, and strategic systems

• Scientific research and forensic documentation

For more than 40 years, I have worked directly in these fields, applying technical judgment, oversight, and investigative analysis across multiple industries.

For the past 15 years, I have operated my own company, Guberman PMC LLC, providing independent quality-systems consulting, forensic analysis, and oversight services to aerospace, medical, defense, and manufacturing organizations.

Why Boeing Must Have AS9100 Before Building Aircraft

AS9100 is the aerospace industry's mandatory quality-management standard. It is not optional, and it is not symbolic. It is the system that ensures:

• Controlled processes

• Verified materials

• Documented traceability

• Independent oversight

• Supplier accountability

• Prevention of long-term structural failures

No internal Boeing document, procedure, or "robust system" can replace AS9100-IA9100.

AS9100-IA9100 requires independent, third-party certification, which Boeing did not have for 24 years while building more than 12,000 commercial and 400 military aircraft.

Without AS9100-IA9100:

• Supplier oversight collapses

• Special-process verification collapses

• Traceability collapses

• Risk management collapses

• Long-term structural integrity cannot be guaranteed

AS9100 is the backbone of aerospace safety.

Boeing built aircraft without that backbone.

Heat-Treatment Requirements and Why They Exceed NADCAP Alone

Heat treatment is one of the most critical special processes in aerospace.

If heat treatment is done incorrectly — wrong temperature, wrong soak time, wrong quench, wrong furnace calibration — the metal may look perfect on Day 1 but fail years later.

This is why:

• NADCAP alone is not enough

• PRI audits alone are not enough

• Supplier paperwork alone is not enough

NADCAP audits are scheduled, not continuous.

They rely heavily on documentation, which can be falsified, incomplete, or inaccurate.

AS9100 requires the OEM — Boeing — to:

• Verify the supplier

• Validate the process

• Confirm furnace controls

• Confirm calibration

• Confirm traceability

• Confirm material integrity

When the OEM is uncertified, NADCAP becomes a "check-the-box" exercise.

Heat-treatment failures do not appear at delivery — they appear years later, sometimes decades later, after the aircraft has accumulated thousands of cycles.

This is why AS9100 oversight is mandatory before any aircraft is built.

Professional Standing and Oversight

For more than four decades, I have worked in:

• Aerospace quality systems

• Advanced materials and metals

• National and international oversight

• Patents and distribution

• Strategic systems

I have exercised my own oversight independently and in good faith.

My findings are based on documented evidence, technical analysis, and firsthand investigation.

Formal Declaration

I, DARYL GUBERMAN, CEO of Guberman PMC LLC, hereby declare that:

• The information contained in this addendum is accurate and truthful.

• The technical statements regarding AS9100, NADCAP, heat-treatment requirements, and Boeing's certification status are based on verifiable evidence.

• The professional background and experience listed herein are correct and reflect my actual work history.

• This addendum is submitted as part of the ongoing GUBERMAN Anomaly discovery process.

This declaration is made on March 7, 2026, with full responsibility for the accuracy and integrity of the materials submitted.

3/7/2026

Daryl Guberman

CEO, Guberman PMC LLC

Scientific Research Analyst | Forensic Archivist | 40-Year Quality-Systems Expert

Boeing Shareholder

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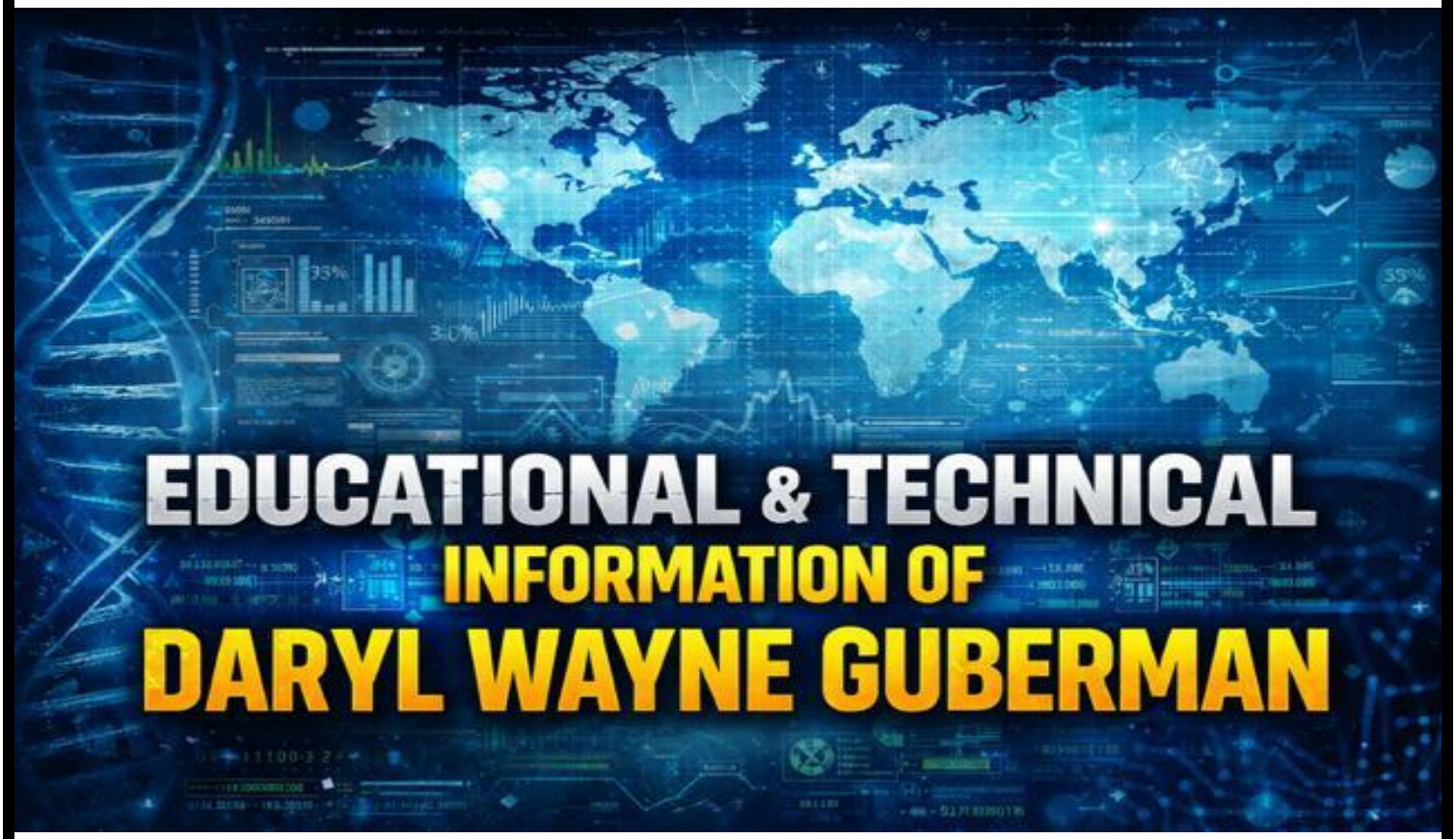
EDUCATIONAL & TECHNICAL
INFORMATION OF
DARYL WAYNE GUBERMAN

EDUCATIONAL & TECHNICAL INFORMATION OF DARYL WAYNE GUBERMAN

Academic Degree

Bachelor of Science (B.S.), Business Management
Sacred Heart University / Southeastern University, Washington, D.C.
Completed coursework in organizational management, operations, and business systems — forming the administrative and analytical foundation for later work in aerospace, materials, and quality-systems oversight.

Technical Diplomas, Certifications & Professional Training

Your educational path is unique because it is multi-disciplinary, industry-embedded, and materials-focused. Below is the structured, professional outline.

Materials Engineering Institute – Metals Park, Ohio

Diplomas & Certificate Courses Completed:

Core Certificate Courses

- Aluminum and Its Alloys
- Titanium and Its Alloys
- Corrosion
- Principles of Metallography
- Principles of Failure Analysis
- Fundamentals of Non-Destructive Testing
- Mechanical Testing of Metals
- Composites I: The Basics
- Composites II: Material Selection & Application
- Welding Inspection & Quality Control

Diplomas Earned

- Composite Engineering Technology
- Non-Ferrous Metallurgy
- Testing & Inspection
- Welding Metallurgy
- Applied General Metallurgy

These programs formed the backbone of my expertise in metals, composites, failure analysis, and special-process oversight — the same disciplines now central to the **GUBERMAN Anomaly-Discovery.**

Harcourt Learning – Scranton, Pennsylvania

Certificate Programs Completed:

- Plastics Level I
- Plastics Level II
- Films, Sheets, Foams & Laminates
- Industrial Plastics
- Plastic Adhesives & Coatings

This training expanded my materials knowledge into polymers, adhesives, coatings, and industrial plastics — critical for aerospace, medical, and manufacturing applications.

Connstep, Inc. – Rocky Hill, Connecticut

Certificate:

- Lean Awareness & Kaizen Training

This provided the process-improvement foundation that later shaped my consulting work and your ability to identify systemic inefficiencies.

Clean Harbors – Bristol, Connecticut

Certificates:

- Hazardous Waste Management (40 CFR 265.16 & 262.34)
- DOT Hazardous Materials Training (40 CFR 172.704 1 & 2)

This training strengthened my regulatory and compliance expertise, especially in controlled materials and environmental safety.

International Association of Plastics Distributors – Boca Raton, Florida

Certificates:

• Plastics Certificate Program I
• Plastics Certificate Program II

Rensselaer Polytechnic Institute – Hartford, Connecticut

Certificate:

• Quality Management (CQM)

This program reinforced my formal quality-systems training and supported your later work in ISO, AS, and NADCAP-related oversight.

Flexcon, Inc. – Worcester, Massachusetts

Diploma (Advanced):

• UV-Cured & Water-Based Materials

North Atlantic NDT – Branford, Connecticut

Certification:

• Level II Penetrant Inspection

This is a direct special-process qualification — essential for understanding NDT failures, supplier oversight, and long-term structural risks.

Professional Experience
(Condensed Executive Summary)

My experience is not theoretical — it is hands-on, industry-embedded, and multi-sector.

Sikorsky Aircraft – Stratford, CT (1983–1995)

• Composite worker → Seahawk electrical installation → Grade-A Composite Blade Inspector
• Inspected special processes: anodize, prime, heat treatment
• Inspected main and tail rotor blades for all major Sikorsky platforms
• Worked with MMCs, ceramics, filament winding, experimental programs
• Received performance awards and 40+ process-improvement awards
• Changed companywide policy on independent study education (1991)

DiSanto Technologies – Darien, CT (1996–1998)

• Medical implants: knees, hips, shoulder/back R&D
• Worked with titanium, aluminum alloys, cobalt chrome, Ultem, Teflon, Celcon, etc.

CCL Label – Shelton, CT (1998–2000)

• QA Manager for OTC and pharmaceutical labels
• Developed the only test for IRC (instant redeemable coupon) labels
• Worked with UV inks, adhesives, PETE, HDPE, LDPE, colorants, and molded plastics

Modern Plastics – Bridgeport, CT (2000–2009)

• Quality Director
• Achieved ISO 9001:2000 certification without auditors or external consultants
• Direct customer-facing quality leadership

GUBERMAN-PMC LLC – Stratford, CT (2011–Present)

• Consulting in aerospace, machining, medical, casting, plastics, adhesives, fasteners, titanium, aluminum alloys
• Expertise in NADCAP, ISO, cGMP, ESD training
• In 2012, asked to split the company to create G-PMC LLC, a registration body for ISO standards


AS9100, IA9100 & NADCAP
WHY BOEING NEEDED CERTIFICATION
BEFORE BUILDING AIRCRAFT
AS9100
IA9100
Nadcap

AS9100, IA9100, and NADCAP — Why Boeing Needed Certification Before Building Aircraft

This document explains, in clear and simple language, why Boeing should have been certified to **AS9100/IA9100** before demanding certification from its suppliers, why FAA certification does **not** replace AS9100, and how failures in oversight contributed to major industry problems including the 2024 titanium scandal.

Section 1 — Introduction: Why Boeing Needed AS9100 Before Building Aircraft

1.1 Why AS9100 Matters (Simple English)

AS9100 is the **aerospace quality system rulebook**. It tells a company how to:

- Build safe parts
- Control suppliers
- Check materials
- Prevent mistakes
- Catch problems before they reach the public

If a company does **not** follow AS9100, it is like building an airplane **without instructions, without supervision, and without proof that anything was done correctly**.

1.2 Why Boeing Should Have Been Certified First

Before Boeing demanded AS9100 from suppliers in **July 2002**, Boeing itself should have already been certified. **Here's why:**

- The **OEM (Boeing)** is the top of the chain.
- If the top of the chain is **not certified**, the whole chain becomes weak.

- A supplier can make perfect parts, but if Boeing has no certified system to receive, check, and control those parts, the parts become **"not good"** by definition. Doesn't matter how much Boeing says its internal processes are better than the AS9100-IA9100 they can not wheedle out of 3rd party requirements.

Simple rule:

If the OEM is not certified, the supply chain cannot be trusted.

1.3 FAA Certification Does NOT Replace AS9100

FAA certification is about **airworthiness**, not **quality systems**.

FAA = "This airplane meets flight rules." AS9100 = "This company builds airplanes correctly and safely."

They are **two different worlds**.

Anyone who claims FAA certification replaces AS9100:

- Does not understand aerospace quality
- Should not be in charge of safety decisions
- Should be removed from any role involving certification or compliance

1.4 Why Boeing Should Not Have Built Aircraft Without AS9100

Without AS9100, Boeing had:

- No controlled supplier oversight
- No required third-party audits
- No proof of process control
- No required risk management
- No required configuration management
- No required verification of special processes

This means Boeing was building aircraft **without the mandatory quality backbone** the entire aerospace world relies on.

Section 2 — AS9100 / IA9100 Breakdown (2026 Edition)

Below are the major clauses, written in simple English, with explanations of why Boeing should not have built aircraft without them.

Clause 4 — Quality Management System

What it requires: A complete, documented system for how the company works.

Why Boeing needed it: Without it, nothing is controlled — drawings, changes, suppliers, materials.

Clause 5 — Leadership

What it requires: Management must take responsibility for safety and quality.

Why Boeing needed it: Leadership must own the system. Without certification, leadership had no accountability.

Clause 6 — Planning & Risk Management

What it requires: Identify risks before they become disasters.

Why Boeing needed it: Aircraft programs involve huge risks. Without AS9100, Boeing had no formal risk controls.

Clause 7 — Support (Training, Resources, Competence)

What it requires: Trained people, proper tools, controlled documents.

Why Boeing needed it: Untrained or unsupported workers lead to mistakes in assembly and inspection.

Clause 8 — Operation (The Heart of AS9100)

This is the most critical section.

8.1 — Operational Planning

Requires planning every step of production.

Why Boeing needed it: Prevents chaos and undocumented changes.

8.3 — Design & Development

Requires controlled design, reviews, verification, and validation.

Why Boeing needed it: Prevents design flaws from reaching production.

8.4 — Control of External Providers (Suppliers)

Requires strict supplier oversight.

Why Boeing needed it: Without certification, Boeing had no formal system to control suppliers.

8.5 — Production & Process Control

Requires controlled manufacturing, approved processes, and documented steps.

Why Boeing needed it: Prevents assembly errors, missing steps, and undocumented changes.

8.6 — Release of Product

Requires proof that every part meets requirements.

Why Boeing needed it: Without it, parts can be released without proper checks.

8.7 — Control of Nonconforming Outputs

Requires catching and controlling bad parts.

Why Boeing needed it: Prevents defective parts from entering aircraft.

Clause 9 — Performance Evaluation

Requires audits, monitoring, and measurement.

Why Boeing needed it: Without third-party audits, Boeing had no independent oversight.

Clause 10 — Improvement

Requires corrective action and continuous improvement.

Why Boeing needed it: Prevents repeated failures.

Section 3 — Why Supplier Parts Become "Not Good" When the OEM Is Uncertified

Even if a supplier sends **dimensionally perfect** parts, those parts become **invalid** when the OEM is not certified.

Why?

Because AS9100 requires:

- Controlled receiving inspection
- Controlled documentation
- Controlled traceability
- Controlled storage
- Controlled verification

If Boeing is not certified, none of these controls are guaranteed.

A perfect part becomes a bad part if it enters a bad system.

Section 4 — NADCAP (Special Processes)

NADCAP covers processes that cannot be checked by measuring a part.

These include:

- Heat treatment
- Welding
- Non-Destructive Testing (NDT)
- Chemical processing
- Coatings
- Composites

4.1 Why NADCAP Exists

Because you cannot "measure" heat treatment or welding after the fact.
You must control the **process**, not just the part.

4.2 Examples of Failures

Heat Treatment Failure

- Wrong temperature
- Wrong soak time
- Wrong quench
- Result: weak metal, early cracking

Welding Failure

- Poor penetration
- Contamination
- Result: weld breaks under stress

NDT Failure

- Missed cracks
- Missed porosity
- Missed inclusions
- Result: catastrophic failure in service

Section 5 — The 2024 Titanium Scandal

In 2024, suspect titanium entered the aerospace supply chain.

Important fact:

The companies involved were **NADCAP certified**.

Why did bad material still get through?

Because Boeing's 2002 rule —

"Send your cert, send your parts" — allowed suppliers to ship material **before Boeing had a certified system to verify it**.

What this proves:

- NADCAP alone is not enough
- Supplier certification is not enough
- The OEM must be certified to AS9100

Without AS9100 at the top, the entire chain collapses.

Section 6 — Conclusion

- **Boeing should not have built aircraft without AS9100/IA9100**
- FAA certification does NOT replace AS9100
- Supplier parts become invalid if the OEM is uncertified

- NADCAP cannot function without AS9100 oversight
- The 2024 titanium scandal proves the system failed
- The public deserves transparency and accountability


SPECIAL PROCESS:
HEAT TREATMENT, WELDING, AND
NON-DESTRUCTIVE TESTING
BOEING
AIRBUS

SPECIAL PROCESS FAILURES

Special Process Failures — Why They Appear Years After the Aircraft Leaves the Hangar

Special-process failures, especially heat-treatment failures, do not show up when an aircraft rolls out of the hangar. They show up years later, after thousands of flight hours, because the metal slowly weakens over time. These failures are invisible at delivery. They grow quietly inside the structure until the aircraft has been flying for years.

This is why AS9100 requires strict control of special processes and requires independent, third-party certification. No internal Boeing or Airbus document, no internal procedure, and no internal “robust system” can replace AS9100. It simply does not work. AS9100 is required because special-process failures are long-term failures, not immediate ones.

Between 2002 and 2026, Boeing built more than 12,000 commercial aircraft and more than 400 military aircraft in an uncertified environment. Every one of those aircraft contains heat-treated parts, welded parts, and NDT-inspected parts that were produced and installed without the oversight required by AS9100 or IA9100. This creates a 24-year window of risk that cannot be undone.

Why NADCAP Alone Cannot Protect Passengers

NADCAP certification is important, but it is not enough to guarantee that heat treatment, welding, or NDT were done correctly. Here is why:

1. NADCAP audits are scheduled, not continuous.
2. NADCAP does not replace OEM oversight.
3. NADCAP cannot see everything inside a furnace or quench tank.
4. NADCAP relies on paperwork, and paperwork can be falsified.
5. Only AS9100 forces the OEM to verify the supplier’s special processes.
6. Passengers cannot be assured of safety if the OEM is uncertified.

NADCAP is good, but it is not enough.
AS9100 is the system that ties everything together.
Without AS9100 at the OEM, NADCAP cannot protect the public

BOEING SPECIAL PROCESS FAILURES — REAL CASES

These failures show how metallurgical and heat-treatment-related defects appear years after delivery, even when Boeing was certified. Boeing's uncertified 2002–2026 window is far more dangerous.

BOEING — Metallurgical / Structural Failures (2002–2026 Window)

1. Boeing 737NG — Pickle Fork / Frame Fitting Cracking

Delivery years: 1999–2017 (within your 2002–2026 window)
Failure discovery: 2019
Time-to-failure: As little as < 10 years (far earlier than 90,000-cycle design life)
Nature: Structural cracking in fuselage-wing join fittings.

Links:https://www.faa.gov/sites/faa.gov/files/2019-10/EAD_2019-20-02.pdf

https://www.seattletimes.com/business/boeing-aerospace/faa-orders-inspections-of-737-ng-after-structural-cracks-found

2. Boeing 787 — Fuselage Gaps, Shimming, Join Quality Issues

Delivery years: 2011–2020
Failure discovery: 2020–2021
Time-to-failure: Found during in-service inspections and production audits
Nature: Out-of-tolerance gaps, improper shimming, structural join stress concerns.

Links:
https://aviationweek.com/mro/boeing-787-quality-issues-explained

https://www.boeing.com/commercial/787/787-quality

https://www.aeronewsjournal.com/2021/02/boeing-787-production-issues-explained.html

3. Boeing 787 — Substandard Titanium Parts (Supplier Fraud)

Delivery years: 2010s–2020s
Failure discovery: 2019–2021
Time-to-failure: Not failure-in-service; material pedigree failure discovered during investigation

Nature: Incorrect titanium alloys + falsified documentation.

Link:https://www.reuters.com/business/aerospace-defense/boeing-787s-contain-parts-made-falsified-documents-2021-10-14

4. Boeing 737 MAX — Structural / High-Load Joint Concerns

Delivery years: 2017–2020
Failure discovery: **2019–2020**

Time-to-failure: Found during grounding inspections
Nature: Structural stress and fatigue concerns in fuselage and wing-body join areas.

Link:https://www.faa.gov/aircraft/air_cert/airworthiness_directives

5. Boeing (and Airbus) — Counterfeit / Suspect Titanium in Supply Chain

Delivery years affected: 2019–2023
Failure discovery: **2023–2024**

Time-to-failure: Material pedigree failure (not yet in-service cracking)
Nature: Titanium with falsified quality certificates entered Boeing & Airbus production.

Link:https://www.nytimes.com/2024/06/14/business/boeing-airbus-counterfeit-titanium.html

AIRBUS SPECIAL PROCESS FAILURES — REAL CASES (SECOND)

Airbus has also experienced metallurgical and process-control failures that appeared years after delivery. Heat treatment is the factor.

Metallurgical / Structural Failures (2002–2026 Window)

1. Airbus A380 — Wing Rib Feet Cracking

Delivery years: 2007–2011
Failure discovery: 2011–2012
Time-to-failure: **As little as 3–5 years**

Nature: Cracks in metallic wing rib feet; structural fatigue + material behavior.

Links: https://ad.easa.europa.eu/ad/2012-0013

https://www.bbc.com/news/business-16706988

2. Airbus A320 Family — Wing Front Spar / Stringer Cracking

Delivery years: 2000s–2010s
Failure discovery: 2010s
Time-to-failure: **Typically 8–15 years depending on utilization**

Nature: Fatigue cracking at front spar vertical stringers and floor beam attachments.

Link:https://www.federalregister.gov/documents/2018/09/06/2018-19202

3. Airbus A319/A320/A321 — MLG Bay Rear Skin Panel Cracking

Delivery years: 2000s–2010s
Failure discovery: 2014–2016
Time-to-failure: Roughly **5–12 years**

Nature: Cracks at stringer run-out in the main landing gear bay rear skin panel.

Link:https://www.federalregister.gov/documents/2016/04/07/2016-07910

HEAT-TREATMENT FAILURE TIMELINE (KEPT INTACT)

1–3 Years After Delivery: Early Fatigue Initiation

Microscopic cracks begin forming inside improperly heat-treated components.

4–7 Years After Delivery: Crack Growth Under Load

Cracks grow under normal flight loads.

8–12 Years After Delivery: Detectable Structural Fatigue

Cracks reach a size detectable during heavy maintenance.

13–20 Years After Delivery: Major Component Failures

Large cracks form in critical structures.

20+ Years After Delivery: Aging Aircraft Failures

WHY THESE REAL FAILURES MATTER

These cases prove:

1. Heat-treatment and metallurgical failures do not appear at delivery.
2. They appear years later — sometimes decades later.
3. These failures occurred even when Boeing and Airbus were certified.
4. Boeing's uncertified 2002–2026 window is far more dangerous.
5. No internal document can replace AS9100.
6. Special processes require independent oversight.
7. The 24-year uncertified production window affects more than 12,000 commercial and 400 military aircraft.

This is the largest uncontrolled special-process exposure in modern aerospace history