

# Naval Audit Service



## Audit Report



# Reporting of Marine Corps Equipment Mishaps

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**N2011-0005**  
**10 November 2010**

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N2010-NIA000-0039.001  
10 Nov 10

MEMORANDUM FOR COMMANDANT OF THE MARINE CORPS

Subj: **REPORTING OF MARINE CORPS EQUIPMENT MISHAPS (AUDIT REPORT N2011-0005)**

Ref: (a) NAVAUDSVC letter 7510/N2010-NIA000-0039.000, dated 20 Nov 09  
(b) SECNAV Instruction 7510.7F, "Department of the Navy Internal Audit"

Encl: (1) Activities Visited and/or Contacted

**1. Introduction.** We have completed the subject audit, announced in reference (a) and are providing this report in accordance with reference (b). Reference (a) originally announced the audit (N2010-NIA000-0039.000) as a single audit focusing on personnel and equipment mishaps. However, during the audit, the audit project was separated into two subprojects: Equipment (N2010-NIA000-0039.001), and Personnel (N2010-NIA000-0039.002). In this report, we are making no recommendations because the conditions found regarding the reporting of equipment mishaps, in our opinion, were not significant.

**2. Reason for Audit.**

a. The audit objective was to verify that the Marine Corps' current safety mishap reporting processes provide complete, accurate, and readily accessible data for use in analyzing trends and decisionmaking within the Marine Expeditionary Forces (I MEF and II MEF) and selected installations within Marine Corps Bases, Atlantic and Pacific. We focused our efforts on I MEF and II MEF for equipment mishaps.

b. The Auditor General of the Navy initiated this audit in response to report N2010-0016, "Reporting of Safety Mishaps," which covered the Department of the Navy. The N2010-0016 report found that mishaps (personnel and equipment) were significantly underreported in the Web-Enabled Safety System (WESS). We performed the current audit from 20 November 2009 to 10 November 2010. Conditions noted existed during Fiscal Year (FY) 2008 through the first quarter of FY 2010.

**3. Communication with Marine Corps Management.** Throughout the audit, we kept the Assistant Commandant of the Marine Corps informed of the audit results. We held

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briefings with the Director, Commandant of the Marine Corps (CMC) Safety Division on 19 November 2009 and 12 April 2010. We briefed Marine Corps Forces Command on 2 December 2009, and we briefed the Chief of Staff, 2nd Marine Logistics Group on 14 January 2010. We also briefed II MEF, Director of Safety and Standardization on 6 and 15 January 2010. Finally, we briefed I MEF Safety Director and I MEF Command Inspector General on 13 July 2010. These briefings were held to provide continuous communication regarding the results of the audit.

#### **4. Background, Scope, Methodology, and Pertinent Guidance.**

##### **a. Background.**

(1) The Secretary of the Navy's memorandum from 6 July 2009 states that mishaps, hazards and "near-miss" events must be quickly identified, analyzed, and openly communicated so lessons learned will prevent recurrence. In addition, Marine Corps Order (MCO) P5102.1B (7 January 2005), provides for: (a) standardized investigation, reporting, and recordkeeping procedures, and (b) the requirement that mishap causal factors be identified for developing appropriate corrective actions. WESS is the officially mandated system for reporting and tracking all Department of the Navy (DON) personnel and equipment mishaps. The system is managed and maintained by the Commander, Naval Safety Center (COMNAVSAFECEN), who uses the data to identify mishap trends and help develop effective DON mishap prevention strategies, as well as maintain safety statistics and other information in support of DON commands.

(2) The Assistant Commandant of the Marine Corps (ACMC) is designated as the Safety and Occupational Health official for the Marine Corps. ACMC implements safety policies and chairs the Marine Corps Executive Safety Board (ESB<sup>1</sup>). The Director, CMC Safety Division (SD) provides direct support to ACMC in: determining safety policies and objectives; developing procedural guidelines; preparing and implementing directives; and administering, coordinating, and managing the Marine Corps Safety Program in accordance with MCO 5100.29A (1 July 2004).

**b. Scope.** This audit covered reporting of Marine Corps equipment mishaps at I MEF and II MEF. We visited selected Marine Corps units at II MEF listed in Enclosure (1). We focused on Class B and C ground equipment, but also reviewed "other reportable" equipment mishaps for FYs 2008 through 2009, and the first quarter of FY 2010. We defined ground equipment as machine guns, anti-tank missiles, artillery, night-vision optics, armored vehicles, amphibious tractors, and communications equipment. However, weapons were excluded from our review.

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<sup>1</sup> The Executive Safety Board was renamed the Executive Force Preservation Board in May 2010.

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**c. Methodology.**

(1) We reviewed and evaluated internal control procedures used to capture equipment mishaps and reviewed compliance with Secretary of the Navy Instruction 5200.35E, Department of the Navy (DON) Manager's Internal Control (MIC) Program. This guidance requires that we evaluate and disclose compliance with this instruction during every audit and that each Navy and Marine Corps command maintain the following MIC documentation: an inventory of assessable units, the organization's MIC plan, risk assessment documentation, internal control assessments, and corrective action documentation for reportable conditions and material weaknesses. We also reviewed the degree of oversight provided to ensure mishaps are reported in WESS.

(2) To determine the processes and procedures used to report equipment damaged as a result of a mishap, we interviewed maintenance personnel at 2nd Maintenance Battalion (2D Maint Bn) to determine their process and procedures for handling damaged equipment.

(3) We identified the Recoverable Item Report (WIR) On-Line Process Handler (WOLPH) and the Marine Corps Equipment Readiness Information Tool (MERIT) as systems that capture equipment readiness and historical information used by the Marine Corps. These systems were also used to identify potentially unreported equipment mishaps. The WOLPH system provides Marine Corps units with an online method of requesting disposition instructions for excess/damaged equipment that requires a higher level of repair from the item managers at the Marine Corps Logistics Command (MCLC), Albany, GA. MERIT is a ground equipment readiness management decision support tool and a Web-based program that pulls data from the supply and maintenance management legacy systems used by the Marine Corps. MERIT ties the maintenance and supply data together, providing complete supply chain visibility throughout the Marine Corps. It includes equipment acquisition costs. We requested and were granted access to both the WOLPH and MERIT systems. We used MERIT to determine equipment costs using the serial number or the Table of Authorized Materiel Control Numbers (TAMCN).

(4) The primary automated systems used to extract data for this audit were WESS, WOLPH, and MERIT. Since the evaluation of these computer-based systems was not the main objective of the audit, we did not audit the information systems themselves. We did however, assess the impact of invalid or incomplete data and determined they would not have a significant impact on our results.

(5) We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence

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obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

**d. Pertinent Guidance.**

(1) Marine Corps Order (MCO) P5102.1B (7 January 2005), requires military personnel to report mishaps involving equipment under their responsibility to COMNAVSAFECEN. The instruction requires that all reportable equipment mishaps are reported through WESS, which was developed for the Navy and Marine Corps by COMNAVSAFECEN. All mishaps should be reported regardless of whether there was an associated personnel injury.

(2) MCO also defines a mishap as any unplanned event or a series of events, which interfere with or interrupt a process or procedure and may result in a fatality, injury, or occupational illness to personnel or damage to property. A reportable mishap includes military on- and off-duty mishaps, as well as incidents involving damage to Government property. Mishaps are classified using three categories (A, B, and C), which take into account the severity of the resulting injury, occupational illness, or property damage. Property damage severity is generally expressed in terms of cost and is calculated as the sum of the costs associated with Department of Defense (DoD) property that is damaged in a mishap.<sup>2</sup>

(3) Additionally, MCO P5102.1B requires that all Government Motor Vehicle (GMV) or Government Vehicle Other (GVO) mishaps resulting in \$5,000 or more in damages to vehicles or property must be reported to COMNAVSAFECEN. Also, reporting is required for any mishap caused by a GMV/GVO resulting in \$5,000 or more in damages when an incident involves a private vehicle or private property damage, and/or injuries/fatalities to non-DoD personnel.

(4) MCO 5100.29A, "Marine Corps Safety Program" (1 July 2004), states that COMNAVSAFECEN supports the Marine Corps Safety Program by agreement with the Commandant of the Marine Corps (CMC). COMNAVSAFECEN services include: collecting mishap reports; analyzing data; providing statistical reports; conducting independent safety investigations of major mishaps and training deaths; and providing technical assistance, safety surveys, publication support, and safety program consultations. Prompt reporting is critical to the success of the Marine Corps Safety Program.

**5. Federal Managers' Financial Integrity Act.** The Federal Managers' Financial Integrity Act (FMFIA) of 1982, as codified in Title 31, United States Code, requires each

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<sup>2</sup> Under Secretary of Defense (Acquisition, Technology, and Logistics) Memorandum, "Revision to Cost Thresholds for Accident Severity Classification" (5 October 2009): Revises the mishap severity classification cost thresholds in DoD Instruction 6055.7 to > or = \$2 million for Class A; > or = \$500,000 but < \$2 million for Class B; and > or = \$50,000 but < \$500,000 for Class C (effective 1 October 2009).

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Federal agency head to annually certify the effectiveness of the agency's internal and accounting system controls. In our opinion, the weaknesses noted in this report do not warrant reporting in the Auditor General's annual FMFIA memorandum identifying management control weaknesses to the Secretary of the Navy.

**6. Audit Results.**

a. While the Marine Corps had documented processes and procedures for reporting equipment mishaps, they were not always followed, resulting in the relatively minor underreporting of ground equipment mishaps. MCO P5102.1B requires that all mishaps are reported using WESS to COMNAVSAFECEN. We identified 50 unreported equipment mishaps during FY 2008 through the first quarter of FY 2010. These mishaps were not reported because:

- Unit personnel were often unaware of equipment mishap reporting requirements and misinterpreted the guidance. Units generally reported equipment mishaps when there was an associated personnel injury; and
- There was no mechanism in place between unit maintenance and safety to alert those responsible for reporting mishaps to COMNAVSAFECEN about equipment damaged as a result of mishaps. Maintenance personnel were unaware of the need to report equipment damaged as a result of a mishap or did not fully understand what constituted a reportable equipment mishap.

b. When equipment mishap events are not reported, the Department of the Navy's (DON's) and Marine Corps' ability to identify recurring hazards and develop or evaluate mishap prevention strategies is diminished. Also, unreported equipment mishaps are not readily accessible for inclusion in trend analysis and decisionmaking. Complete and accurate data is needed for analyzing trends and decisionmaking.

c. Due to proximity, we visited selected Marine Corps units at II MEF in order to review their processes and procedures for reporting equipment mishaps. Although we did not visit any Marine Corps units at I MEF, we did contact the I MEF Safety Office to obtain documentation regarding potential unreported equipment mishaps identified during our analysis. As a result, we found that unit personnel were often not aware of what constituted an equipment mishap and believed that equipment mishaps were generally associated with a personnel injury.

**d. Internal Controls and Oversight.**

(1) One result of our evaluation of the Manager's Internal Control program at Marine Corps Forces Command (MARFORCOM) indicates that the command identified mishap reporting as an internal control assessable unit. The other is that they also identified WESS as one of the tools used by Director of Safety Standardization (DSS) to

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perform mishap reporting. The most recent MIC initiative from June 2009 did not identify any material weaknesses or reportable conditions related to mishap reporting in the 2009 MARFORCOM Statement of Assurance.

(2) We reviewed program oversight performed by CMC SD. CMC SD provided oversight using Command Safety Assessments (CSA). CSAs are conducted every 3 years for major commands, MEFs, selected subordinate commands, and all installations. There are two different types of assessments tailored to the level of command for addressing the responsibilities at each level. Although in place, the level of oversight does not include procedures to ensure equipment damages resulting from mishaps are in fact reported to COMNAVSAFECEN via WESS.

**e. Processes and Procedures.**

(1) We found that Marine Corps units at II MEF used “flash reports” to notify the chain of command of any unplanned incident or event involving personnel or property. When a mishap occurs, the unit safety officer, duty officer, or tactical safety specialist initiates a flash report and submits it through the safety chain of command. The flash report captures information such as: date and time of incident; type of incident; personnel involved; and whether there was damage to equipment or property. However, we were told that flash reports were not mandatory across the Marine Corps.

(2) We met with maintenance personnel to determine the process and procedures for handling damaged equipment. We found that when equipment is damaged and needs repair, the unit submits an equipment repair order (ERO) to unit maintenance. Unit maintenance personnel inspect the damaged equipment and complete a limited technical inspection form (LTI). If unit maintenance is unable to repair the damaged equipment, the ERO and LTI are forwarded to battalion level maintenance. Battalion maintenance personnel determine the level of repair needed and will either repair the damaged equipment or submit a recoverable item report (WIR) to MCLC, Albany, GA via WOLPH, and request disposition instructions. The purpose of WOLPH is to provide Marine Corps units with an online method of requesting disposition instructions for excess/damaged equipment that requires a deeper level of repair.

**f. Review of WIRs.** To determine if damaged equipment reported to maintenance should have also been reported as a mishap in WESS, we reviewed WIRs. Initially we manually reviewed 175 WIRs from the fourth quarter of FY 2009 to the first quarter of FY 2010 for three companies at 2D Maintenance Battalion. We reviewed 32 WIRs for Motor Transport Maintenance (MTM) Company, 138 WIRs for Electronic Maintenance (ELM) Company, and 5 WIRs for Engineering Maintenance (EMC) Company. We also reviewed the remarks section of each WIR to determine how the equipment was damaged. Of the 175 WIRs reviewed, we initially identified 8 potential mishaps. After

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we performed our analysis, we determined that there were five actual mishaps that potentially should have been reported in WESS. Of the five actual mishaps, there was one instance of a damaged generator we observed on a pallet while at 2D Maintenance Battalion. We requested information on how the generator was damaged. Based on the WIR provided, the generator fell off a truck. We determined after further inquiry that the damaged generator was reported as a mishap in WESS. The other four of the five actual mishaps (80 percent) were not reported in WESS. Based on our limited analysis, we concluded that current processes and procedures at the unit level did not ensure that these equipment mishaps were reported in WESS. Table 1 shows the results of the review of WIRs for three companies at 2D Maintenance Battalion:

**Table 1: Review of WIRs at 2D Maintenance Battalion**

<b>Company</b>	<b>Total WIRs Reviewed</b>	<b>Identified as Potential Mishap</b>	<b>Actual Mishap Identified</b>	<b>Reported in WESS</b>	<b>Not Reported in WESS</b>	<b>Percentage Not Reported in WESS</b>
MTM	32	7	4	0	4	100%
ELM	138	0	0	0	0	0%
EMC	5	1	1	1	0	0%
<b>Total</b>	<b>175</b>	<b>8</b>	<b>5</b>	<b>1</b>	<b>4</b>	<b>80%</b>

**g. Identifying Potential Equipment Mishaps.**

(1) After our initial analysis, we expanded our review to include FY 2008 through the first quarter of FY 2010. To identify additional potential equipment mishaps, we obtained the total number of WIRs in WOLPH from MCLC Albany, GA for both I and II MEFs. The total number of WIRs was 10,706 for I MEF and 7,783 for II MEF. The universe of total WIRs included any type of damaged or excess equipment.

(2) With the assistance of COMNAVSAFECEN personnel, we determined the following searchable words that could be used to identify potential mishaps in WOLPH: accident, collision, rollover, rolling, speeding, fire, and explosion. Using the searchable words, we queried WOLPH by fiscal year for each MEF which resulted in 69 records out of 10,706 for I MEF and 95 records out of 7,783 for II MEF. We then manually reviewed the results to identify potential equipment mishaps. Of the 69 records (WIRs) for I MEF, we identified 26 potential mishaps and of the 95 records for II MEF, we identified 27 potential mishaps. We used MERIT to determine equipment cost using the serial number or the TAMCN. The query results and subsequent number of potential mishaps were low and we did not see where further testing would provide any substantive benefits. Because of this, we proceeded to validate the potential mishaps identified for each MEF.

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(3) We consulted with COMNAVSAFECEN subject matter experts to corroborate whether or not the potential equipment mishaps identified should be reported in WESS. We contacted both I and II MEF safety offices to review and validate the potential mishaps identified, and obtain supporting documentation. Based on the responses from both safety offices and the documentation provided, we found that 2 of the 26 potential mishaps at I MEF had been reported to COMNAVSAFECEN (see Table 2) and that only 1 of the 27 potential mishaps at II MEF had been reported (see Table 3). As a result, 24 of the 26 potential mishaps at I MEF and 26 of the 27 potential mishaps at II MEF were not reported in WESS.

**Table 2: Validation of Potential Mishaps for I MEF**

I MEF	Potential Mishaps Identified	Equipment Cost <sup>3</sup>	Number of Mishaps in WESS	Number of Mishaps Not in WESS	Percentage Actual Mishaps Not in WESS
FY08	8	\$2,964,096	1	7	88%
FY09	16	4,717,896	1	15	94%
FY10	2	226,000	0	2	100%
<b>Total</b>	<b>26</b>	<b>\$7,907,992</b>	<b>2</b>	<b>24</b>	<b>92%</b>

**Table 3: Validation of Potential Mishaps for II MEF**

II MEF	Potential Mishaps Identified	Equipment Cost	Number of Mishaps in WESS	Number of Mishaps Not in WESS	Percentage Actual Mishaps Not in WESS
FY08	12	\$1,182,180	0	12	100%
FY09	9	960,189	0	9 <sup>4</sup>	100%
FY10	6	898,924	1	5	83%
<b>Total</b>	<b>27</b>	<b>\$3,041,293</b>	<b>1</b>	<b>26</b>	<b>96%</b>

h. **Mishaps Reported in WESS.** COMNAVSAFECEN provided a database of equipment mishaps reported in WESS for FYs 2008, 2009, and the first quarter of FY 2010. The data included 213 equipment mishap events. Because the total number of equipment mishaps for the period under review appeared to be small when compared to equipment mishaps reported by the Army,<sup>5</sup> we performed an additional analysis on the mishaps that were reported (213) to identify any best practices or anomalies in existing processes and procedures that were used to report these mishaps in WESS. While the results of this analysis were inconclusive, our analysis found that 38 percent (82 of 213) of the equipment mishaps were associated with a personnel injury, and 62 percent (131 of 213) were not.

**i. Reasons Equipment Mishaps Were Not Reported.**

<sup>3</sup> Represents the total cost of potential mishaps identified in column 2.

<sup>4</sup> Includes 1 of the 4 actual mishaps identified in Table 1 for 2D Maintenance Battalion, MTM Company.

<sup>5</sup>The Army reported a total of 1,776 equipment mishaps for the same time period. This information was used as a point of reference only. We did not evaluate or perform any audit tests on the accuracy.

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(1) Unit and maintenance personnel responsible for preparing equipment repair orders for damaged equipment were often unaware of the need to report or did not fully understand what constitutes an equipment mishap. In general, personnel interviewed believed that equipment mishaps need only be reported in those cases involving injury. We also found that there was no mechanism in place to alert unit safety officers and those responsible for reporting mishaps to COMNAVSAFECEN of an equipment mishap occurrence.

(2) We provided the list of potential mishaps to I MEF and II MEF safety offices to determine why the mishaps were not reported to COMNAVSAFECEN. Although provided responses (e.g. equipment reported as sent for rework or turned in as excess; unit deployed/redeployed, and equipment subsequently listed as belonging to another unit) did not identify root causes, we concluded that unit and maintenance personnel were often unaware of the need to report or did not fully understand what constitutes an equipment mishap. This was cited as the reason for 11 of 24 potential mishaps at I MEF and 1 of 26 potential mishaps at II MEF not being reported in WESS. Misinterpretation of the guidance was also cited as the reason for not reporting for 5 of 24 I MEF and 10 of 26 II MEF potential mishaps. Additionally, maintenance personnel, who deal with equipment damages caused by a variety of reasons, did not communicate with safety personnel when equipment was damaged as a result of a mishap. This was identified as another reason for a lack of reporting. This lack of communication resulted in 8 of 24 and 15 of 26 potential mishaps for I and II MEF respectively.

## **7. Conclusion.**

a. While an opportunity exists for the Marine Corps to strengthen controls over the mishap reporting process for equipment and ultimately improve reporting in WESS, the results presented in this report are not considered material. Therefore, we are not making any recommendations. As this report indicates, equipment mishaps were underreported in WESS by at least 50 mishaps (24 with I MEF and 26 with II MEF) for FY 2008 through the first quarter of FY 2010. This lessens the Department of the Navy and the Marine Corps' ability to identify mishap trends and take efficient and effective action to prevent future equipment mishap occurrences. Complete and accurate data is needed for analyzing trends and decisionmaking.

b. The unreported mishaps identified in this report were generally not reported because of unfamiliarity with the guidance and insufficient communication between unit maintenance and safety officers. Therefore, we suggest that the Marine Corps consider:

- Providing initial and periodic refresher training that includes information on what constitutes an equipment mishap, when equipment mishaps should be reported, and who to notify in the event of a mishap;

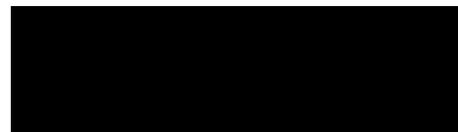
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- Establishing a notification process that would require unit personnel to immediately report damaged equipment to maintenance, as well as safety personnel; and
- Establishing a process that would require maintenance personnel to include in their assessment reports whether damage to equipment was due to a mishap.

c. Any proactive actions the Marine Corps takes to mitigate the risks associated with underreporting mishaps would only serve to strengthen the reporting process and support DON's efforts to prevent the recurrence of mishaps.

8. Any requests for this report under the Freedom of Information Act must be approved by the Auditor General of the Navy as required by reference (b). This audit report is also subject to followup in accordance with reference (b).

9. We appreciate the cooperation and courtesies extended to our auditors.



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Assistant Auditor General  
Installations and Environment Audits

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**Enclosure (1):**

# **Activities Visited and/or Contacted**

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- Assistant Commandant of the Marine Corps, Headquarters Marine Corps Safety Division, Arlington, VA
- Marine Corps Forces Command (MARFORCOM), Norfolk, VA
- Commander Naval Safety Center, Norfolk, VA
- Marine Corps Logistics Command, Albany, GA\*
- I Marine Expeditionary Force (I MEF) Safety Office, Marine Corps Base Camp Pendleton, CA\*
- II Marine Expeditionary Force (II MEF), Marine Corps Base Camp Lejeune, NC
  - II Marine Expeditionary Force Safety Office, Marine Corps Base Camp Lejeune, NC
  - 2nd Marine Air Wing , Marine Corps Air Station Cherry Point, NC
  - Marine Attack Training Squadron (VMAT) 203, Marine Corps Air Station Cherry Point, NC
  - Marine Helicopter Training Squadron (HMT) 302, Marine Corps Air Station New River, NC
  - 2nd Marine Logistics Group – Chief of Staff, Marine Corps Base Camp Lejeune, NC
  - 2nd Maintenance Battalion, Marine Corps Base Camp Lejeune, NC
  - 2nd Dental Battalion, Marine Corps Base Camp Lejeune, NC
  - Combat Logistics Regiment 25, Marine Corps Base Camp Lejeune, NC
- Marine Corps Forces Central (MARCENT), MacDill AFB, FL\*

\*Activities Contacted