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## ALASKA AIR CARRIERS ASSOCIATION

2301 Merrill Field Drive, Suite A-3  
Anchorage, Alaska 99501  
907-277-0071 907-277-0072 fax

*Board of  
Directors  
2010 - 2011*

6 January 2011

*Jerry Rock, President  
JANSSEN  
CONTRACTING CO.*

Congressman Don Young  
US House of Representatives, 2111 Rayburn Building, Washington DC 20515-0201  
via email to [jeremy.price@mail.house.gov](mailto:jeremy.price@mail.house.gov) [chad.padgett@mail.house.gov](mailto:chad.padgett@mail.house.gov)

*Susan Hoshaw, Vice  
President  
EVERTS AIR ALASKA*

The Honorable Mark Begich  
US Senate, 144 Russell Senate Office Building, Washington DC 20510  
Via email to [james\\_feldman@begich.senate.gov](mailto:james_feldman@begich.senate.gov) [schawna\\_thoma@begich.senate.gov](mailto:schawna_thoma@begich.senate.gov)

*Mike Morgan, Secretary  
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AIR VENTURES*

*Danny Seybert, Treasurer  
PENAIR*

The Honorable Lisa Murkowski  
US Senate, 709 Hart Building, Washington DC 20510-0202  
via email to [charles\\_banks@murkowski.senate.gov](mailto:charles_banks@murkowski.senate.gov) [bob\\_walsh@murkowski.senate.gov](mailto:bob_walsh@murkowski.senate.gov)

*Wilfred Ryan, Past  
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ARCTIC  
TRANSPORTATION  
SERVICES*

### **SUBJECT: ALASKA AVIATION SAFETY SUMMIT FOLLOW-UP**

*David Barder  
CALEDONIAN  
INSURANCE GROUP, INC.*

Dear Alaska Delegation Members:

*Bob Hajdukovich  
FRONTIER FLYING  
SERVICE, INC.*

Aviation is essential to the Alaskan way of life. We extend our sincere thanks for your diligent work on behalf of the aviation industry in Alaska.

*Mary Hefty  
ALASKA AIRLINES*

Since 1966 the Alaska Air Carriers Association (AACAA) has represented the interests of aviation businesses in Alaska. Our members own, operate, and service aircraft, providing for the needs of the traveling public through scheduled commuter operations, aircraft maintenance, flight tours, on-demand air charters, fuel sales, parts sales, storage, rental, airline servicing, flight training, and emergency medical evacuation.

*David Karp  
NORTHERN AIR CARGO*

*Chris Matthews  
WRIGHT AIR SERVICE*

The number of fatal crashes and fatalities in 2010 were higher than corresponding average numbers during the previous decade. Aviation crashes from 2000-2009 declined as a result of several safety initiatives in Alaska.

*Brien Salazar  
TAQUAN AIR*

*Mike Stedman  
WINGS AIRWAYS*

One hundred and eighty members of the aviation community met on October 29<sup>th</sup> to acknowledge the seriousness of these accidents, explore solutions, and identify resources to advance aviation safety in Alaska. Six items were identified as vital: pilot proficiency, access to weather information, ADS-B / Capstone equipage, infrastructure maintenance, 100LL aviation fuel, and WAAS availability (Wide Area Augmentation System).

*Bob Yerex  
MAX-VIZ, INC.*

*C. Joy Journeay  
Executive Director  
ALASKA AIR CARRIERS  
ASSOCIATION*

It is vital that the safety initiatives begun in Alaska continue to receive funding and be expanded to provide the resources that contribute to aviation safety. Because of Alaska's unique aviation environment, we are positioned often as an aviation safety leader. We need to keep this momentum advancing and not allow it to stall.

## **I. PILOT PROFICIENCY**

**Problem:** Pilot proficiency was a recurrent theme during the Summit. Approximately 75 % of fatal aircraft accidents in Alaska over the last five years occurred in aircraft operating under Part 91 operations (based on NTSB data). A significant contributing factor in these accidents is lack of proficiency and/or inappropriate decision making on the part of the pilot.

### **Proposed Solution:**

(A) Ensure funding to continue the success of the Medallion Foundation safety initiatives currently available in Alaska, which includes the Medallion Shield and Stars program for the commercial aviation community and pilot access to proficiency equipment throughout the state that includes:

1. 14 simulators in operation located state wide
2. A PFC G-1000 simulator in a Cessna 206 configuration
3. Full motion Super Cub simulator
4. Visual cue based program on Medallion simulators
5. CFIT scenarios are on Medallion simulators

(B) Fund and reactivate the Medallion Foundation General Aviation Flyer Program. This program would include:

#### **Proposed Semi-Annual Requirements**

1. Participants would be required to log a specific number of hours in a Medallion simulator
  - a. Decision making would be the subject in some of the simulator time
  - b. Proficiency maneuvers and recognizing personal and aircraft limitations would be required in some of the simulator time
  - c. Practice flying on instruments and become familiar with IFR operations
  - d. Become familiar with glass cockpits
  - e. Practice estimating in flight visibility
2. Participants required to fly a specific number of observed CFIT scenario's
3. Participants required to conduct a personal safety audit

#### **Proposed Annual Requirements**

1. Attend at least 2 safety courses
2. Read one safety article per month
3. Maintain a personal safety log
4. Document personal minimums
5. Apply risk assessment techniques on every flight
6. Compute weight and balance for every flight
7. Accomplish at least 3 runway risk assessments
8. Safety audit by a fellow Medallion Flyer

## **II. WEATHER INFORMATION**

### **Problem:**

Alaskan aviators fly in a challenging environment that includes extensive mountainous terrain and multiple continually changing weather systems. Pilots in the cockpit have very limited access to changing weather information, and this is crucial to effective decision making.

### **Proposed Solutions:**

(A) Weather cameras have been a significant contribution to improved safety and more cameras are needed. The FAA's current program includes 144 operational sites with plans to expand that number to 221 cameras by the end of 2014. Additional sites are needed as well, and it is crucial that funding be available.

(B) Obstacles to using currently available weather information need to be removed immediately. Multiple agencies are involved in receiving, generating, and approving weather information, and a major disconnect exists in making the information acceptable for pilot use. We would like the delegation to spearhead having these agencies immediately at the table to facilitate the removal of current obstacles: FAA, NWS/NOAA, NASA, & NTSB, UAA, and the State of Alaska.

(C) The technology already exists to capture weather. We need to expand on this technology and combine its potential. Access to weather needs to be available for the pilot and piped directly into the cockpit. This is a paramount need.

**Problem:** Weather forecasting is over-generalized and often inaccurate. Area forecasts apply to large geographic areas, which may contain multiple micro-climates and active weather systems. In the few situations where specific weather forecasts (“terminal forecasts”) exist, these forecasts are routinely inaccurate and slow to be updated when the actual weather conditions have deteriorated below the forecasted conditions. The use of non-specific or inaccurate weather forecasts is an impediment to sound aeronautical decision making.

**Proposed Solution:** In addition to facilitating the inter-agency effort to improve promulgation of weather information recommended above in paragraph II (B), charge these agencies with improving the quality of forecast products, including setting goals and measuring their performance in achieving those goals.

### **III. WAAS (WIDE AREA AUGMENTED SYSTEM)**

#### **Problem A:**

Enroute navigation and air travel in and out of airports in the North Slope region of Alaska recently sustained a major setback. Their reliance upon the WAAS technology to facilitate vertically guided landings and take offs and to provide navigation on enroute Q and T Routes has been lost because a WAAS GEO satellite orbit is not operational. While it is true that LPV (localized performance with vertical guidance) approaches are not yet published for 16 airports in this affected region, there is still a degradation of service for those aircraft who are currently WAAS-equipped. Because of this degradation of service, without satellite-based navigation, air travel in and around the 16 airports, as well as enroute, will be more hazardous, especially during inclement weather. Previously, WAAS-equipped aircraft who flew enroute T routes could descend out of icing conditions to a lower MEA (minimum enroute altitude). Without the WAAS availability, aircraft are restricted and may not be able to descend low enough to fly out of icing conditions. According to a published FAA NOTAM, it is also expected that temporary interruptions to WAAS service throughout Alaska can occur with the loss of the satellite.

#### **Proposed Solution:**

Encourage the FAA to review the current contract which requires the contractor offering this service to replace the satellite. A near-term solution may be available, but it is important that WAAS service be provided on a replacement satellite to be launched in 28 months. The FAA should not be allowed to let WAAS service slip further than this launch.

**Problem B:** The 16 North Slope airports affected by the loss of the WAAS geostationary satellite, which provided coverage in that region, have not lost the availability of existing GPS approaches at those airports, since they do not yet have published LPV approaches.

However, there are many airports throughout the state which still do not have any type of published instrument approach. This forces both commercial operators and individual pilots to choose between the risk of accessing these communities using visual flight rules (VFR) in marginal weather, or postponing flights and risking the loss of business to other operators who choose to operate VFR in marginal weather. With the

advent of relatively inexpensive GPS approaches, no operator or individual pilot who is properly equipped and trained for instrument flight (IFR) should be faced with that choice.

**Proposed Solutions:**

- (A) Work with the FAA to streamline and accelerate the pace of LPV approach development in Alaska. Advocate for special Alaska-based exemptions to FAA standards, such as airport survey requirements, where these standards ultimately impede safety by delaying the development of LPV approaches. These exemptions could be predicated on the “equivalent level of safety” concept, using risk mitigation strategies such as approach specific special aircraft/ aircrew qualification requirements.
- (B) Challenge the FAA to assess not just capacity improvement, but actual safety improvement when deciding where to allocate resources for IFR infrastructure. For example, the FAA should consider establishing LPV approaches, including weather reporting, at smaller community airports where terrain and weather factors increase risk, before larger community airports that may be accessed via instrument approaches at nearby IFR airports across level terrain.
- (C) Work with the State of Alaska to upgrade more airports to IFR capability. Identify airports in areas not presently served by IFR approaches. For example, the nearest public airport to Sleetmute (PASL) with an IFR approach is 68 nautical miles away, across mountainous terrain in Aniak.
- (D) Lobby for increased autonomy for the Alaska Region of the FAA. Air transportation in Alaska is unique because it is essential, not discretionary, and because of the extremes of weather, terrain, and distances. FAA officials in Oklahoma City or Washington DC, who can simply get in their cars and drive when they need essential goods and services, should not be making decisions about which communities in Alaska should gain the accessibility and safety improvements afforded by GPS approaches and other IFR infrastructure improvements.
- (E) Lobby for the same WAAS GEO satellite coverage as the Lower 48 states. The leasing of GEOs should be an ongoing program, given the nature of a satellite’s life and given the possibility of additional unexpected WAAS GEO satellites similar to the present GEO outage. Impending predicted solar storms will only exacerbate this GEO outage problem.

**IV. ADS-B AND CAPSTONE**

**Problem:**

Capstone I and Capstone II proved the success of ADS-B technologies when they were implemented and tested in SE and SW Alaska. This momentum is being lost and must be expanded to general aviation, which has not benefited from its existence.

**Proposed Solution:**

It is important to note that when introduced, Capstone was to include three items: terrain avoidance, traffic awareness, and weather information. Weather is not yet included and is vital for safe decision making (see Item II above).

**V. ASSURED AVAILABILITY OF 100LL (LOW LEAD) AVIATION FUEL**

**Problem:**

The high cost of flying is cited as a major deterrent to general aviation pilot flight proficiency. On top of the cost of fuel, the current uncertainty of the continued availability of 100LL fuel is having a serious impact on general aviation. There is no current alternative that is economically viable or that can be used safely.

**Proposed Solution:**

Require the FAA to:

- (A) Work cooperatively with industry stakeholders and other relevant agencies to develop aircraft engine and fuel emissions and airworthiness regulatory standards to reduce or remove lead emissions from piston engine aircraft.

- (B) Develop a comprehensive program, in collaboration with industry groups representing aviation consumers, manufacturers, fuel producers and distributors, the Environmental Protection Agency and other relevant agencies, to develop aircraft engine and fuel emissions and airworthiness regulatory standards to reduce or remove lead emissions from piston engine aircraft;
- (C) Establish programmatic goals to analyze the current state of unleaded aviation fuel research;
- (D) Assesses the viability of a reduced lead or unleaded aviation fuel with respect to aircraft safety, the FAA capability to certify and approve new aircraft and recertify existing aircraft using reduced lead of unleaded aviation fuel, and technologies which can modify existing piston engine aircraft to enable their safe operation using reduced lead or unleaded aviation fuel; and
- (E) Develop reasonable policy and guidance to facilitate a transition to reduced lead or unleaded aviation fuel without adversely impacting aviation safety.

## **VI. INFRASTRUCTURE MAINTENANCE**

### **Problem:**

Eighty percent of accidents occur on take-off and landing. Alaska is still a frontier state and needs federal commitment to infrastructure development, coupled with State commitment to protective management of that infrastructure. Aviation infrastructure must be adequately maintained.

Condition measurements of non-paved airports in Alaska is not available, but the measurements of paved airports show unacceptable levels of deterioration. Pavement condition indicator (PCI) measurements are taken every two years. On a scale of 1-100, pavement is considered failing if it falls below an indicator of 70. In Alaska, 51% of the Central Region's airports fail, 43% of SE Region airports fail, and 38% of Northern Region airports fail.

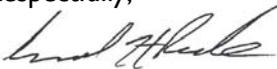
### **Proposed Solution:**

State of Alaska infrastructure must be maintained and a continued emphasis on improving its management and operation is crucial. As stated previously, Alaska is a frontier state without the resources and existing infrastructure found in the other states. Existing manpower and funding is not available to maintain current resources or keep up with expanding federal requirements for that infrastructure (TSA, safety areas, etc.)

## **CONCLUSION**

Again, we extend our sincere thanks for your diligent work on behalf of the aviation industry in Alaska. We look forward to working with you in the future to facilitate each of these solutions to continue improvements for safety in Alaska.

Respectfully,



Gerard H. Rock, AACA President

cc: Alaska Governor Sean Parnell  
AACA Board of Directors  
Medallion Foundation Board of Directors  
FAA Alaska Region  
FAA Administrator Randy Babbitt