



ALASKA AIR CARRIERS ASSOCIATION

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December 29, 2016

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Directors for
2016-2017**

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Mike Stedman
ALASKA SEAPLANES

Luke Hickerson
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RE: Alaska Aviation Weather – Alaska’s Aging and Limited Weather Reporting
Infrastructure Hamper Air Carrier Operations.

Scott Van Valin
ISLAND AIR EXPRESS

The Alaska Air Carriers Association (AACAA) is a membership organization whose mission is to support and advocate for the commercial aviation community. Our members include Part 121, 135, 125, and commercial Part 91 Alaskan air carrier operators.

Megan Matthieu
NORTHERN AIR CARGO

Mike Laughlin
REGAL AIR

The most current economic data representing Alaskas aviation industry estimates there is about \$3.5B worth of economic activity, generated through 47,000 jobs and comprising 8% of Alaska’s gross state product. 82% of the communities in Alaska are dependent on commercial air carrier transportation for routine transportation.

Norman Chance
Sky Airparts International

Chuck Miller
WINGS OF FREEDOM

Recently, AACAA members raised concerns over a FAA legal opinion that would require air carriers to obtain a Terminal Area Forecast (TAF -weather created specifically for an airport) prior to dispatching an aircraft. Current practice is to utilize an available Area Forecast (AF) when a TAF is unavailable. Under current FAA regulations, operators have legally used “current and or forecast weather or a combination thereof” prior to dispatching an aircraft.

Chris Matthews
WRIGHT AIR SERVICE

**Executive
Director**

Jane Dale
ALASKA AIR
CARRIERS
ASSOCIATION

Implementing a requirement for a TAF for air carrier operators will disrupt commerce and impose excessive costs on Alaskan operators. AACAA requests your assistance to urge the FAA to withdraw the requirement for TAF weather where a TAF is currently unavailable and meet with the National Weather Service (NWS) and Federal Aviation Administration (FAA) on providing the additional 157 TAFs as soon as practical.

Weather Availability in Alaska

Aviation weather is limited in Alaska! It’s been estimated (by others) that over 200 new Automated Weather Observation Stations (AWOS) are needed in Alaska to meet the density of aviation weather, AWOS, currently available in the contiguous 48 states.

Carriers and others operating in the contiguous 48 states have public aviation weather available from **AWOS facilities co-located at public use airports and TAF weather** created and published by the NWS. NWS forecasters utilize models to create public weather by incorporating an extensive array of airport AWOS information and other supplemental weather. NWS model data for Alaska has been described as poor and complicated by mountainous terrain, oceans and **lacking observation data**.

Alaska's Aging Infrastructure

Despite consistent attention from FAA Tech Ops staff, AWOS outages in Alaska are frequent. Outages are often attributed to "telco" or old and unreliable telecommunication line infrastructure.

Recently, AACA learned cell phone transmission of encrypted AWOS data is being used in a remote area of California and used to transmit weather camera data in Alaska. Alaskan carriers would welcome any attempts to incorporate this new technology and improve the reliability of AWOS service in rural Alaska.

Outlook for New AWOS

Since the 1990's when Alaska served as the test site for FAA's Capstone Project, FAA has not funded any new AWOS locations in Alaska despite approving a business case for 13 new AWOS in 2010.

Ultimately, additional AWOS facilities are needed to ensure public forecasts are reliable and air carrier transportation in rural Alaska under Instrument Flight Rules is available.

Terminal Area Forecast

Carriers have been asked to purchase a Terminal Area Forecast (TAF) for the 157 destinations where a TAF isn't available at an estimated cost exceeding \$130,000 per year.

These TAFs would not be disseminated as public weather and provided at a cost not expected of carriers operating elsewhere in the contiguous 48 states. Moreover, the FAA program to purchase weather (EWINS), even at a high cost does not give the air carrier a complete weather product meeting all requirements, namely the requirements of 121.651 or 91.155 among others that require not only a forecast but a report.

AACA requests your assistance to urge the FAA to withdraw the requirement for TAF weather where currently unavailable, ensure the NWS has resources necessary to provide the additional 157 TAFs in an expedient manner and support construction of new AWOS weather facilities at airports for reliable forecasts and to support safe transportation of the traveling public.

Sincerely,

Jane Dale, Director
Alaska Air Carriers Association

Matt Atkinson, President
Alaska Air Carriers Association