



ALASKA AIR CARRIERS ASSOCIATION

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May 2, 2014

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Administrator Michael Huerta
Federal Aviation Administration
800 Independence Avenue
Washington, DC 20591

RE: ALASKAN AVIATION SAFETY CONCERNS

Dear Administrator Huerta:

Thank you for once again coming to Alaska to receive input from the aviation community serving the largest state in the US. We know your time is valuable and we appreciate the commitment this takes for you professionally and personally.

Residents of Alaska travel by air eight times more often per capita than those in the Lower 48, and ship 39 times more freight per capita—nearly one ton per person per year. Eighty-two percent of our communities are not accessible by road and rely on aviation for life-sustaining goods and services. When someone in Alaska needs to go to the hospital, they typically travel by aircraft.

We implore the FAA to measure the needs of aviation in Alaska differently than it does in the Lower 48. The typical “business case” model, considering mere numbers and statistics, cannot begin to capture the worth of the infrastructure that serves Alaskans and ultimately the rest of the United States. Keep in mind that the natural resources leaving Alaska every day are vital to almost every industry in the United States.

The following are identified by the nearly 300 certificated air carriers in Alaska as priorities that need the immediate consideration of the FAA.

Timely Processing of Changes to Existing Certificates

Many of our air carriers express considerable frustration and concern regarding the FAA’s refusal to complete timely conformity inspections and certificate changes. We know that other companies across the US have faced the same challenges, and hear from multiple points across the state and nation that FAA inspectors “have received direction from Washington to tell operators who complain that they should instead complain to their Congressmen that the FAA needs more money.” Regardless of where or why the lack of timeliness, safety is profoundly impacted when companies cannot operate effectively and are distracted by their own languishing resources. In addition, to track our member needs, AACAA can get no update on progress from the FAA as no master list is maintained. Aviation insurance brokers can testify that economic hardship on companies carries significant safety risk.

Investment in Aviation Infrastructure and 24-Hour Safe Access to Airports

As stated in this letter opening, a typical “business case” cannot capture the vital nature of airports in Alaska. Any action that threatens to close an approach to day or night operations threatens the lives of Alaskans, where our communities have only air ambulance evacuation to medical treatment.

Last year \$253 million in AIP funding was transferred out of airport improvements to fund FAA operations. Will airport funds in the future be used to bolster funding needs in other areas of the FAA as was done last year?

Existing to support and advocate for a sustainable Alaska commercial aviation industry founded upon the principles of safety management & professionalism

AACAA is a statewide organization representing over 170 members. Our members meet the needs of rural Alaskans and the traveling public by providing scheduled commuter travel, on-demand air charter, emergency medical evacuation, flight seeing, pilot training, aircraft maintenance, parts sales, fuel sales, storage, rental, and airline servicing.



Alaska has many runways that require lengthening for safety reasons. For instance, air carrier priorities in SW Alaska include Kwigillingok, Tununak and Newtok. While we understand that Tununak may be on the list for activity this year, others need to move up in the priority list. Also, the Tok airport needs a VGSI for reliable medevac service so that Tok and the surrounding region do not remain at high risk. The existing runway is short and the VGSI is necessary for larger aircraft to touch down at the threshold. The State of Alaska owns the existing VGSI but has no plans to replace it.

In the fall of 2013, many public use airport 20:1 approaches were NOTAM'd closed to night operations. This action was the result of the FAA approach review, conducted every two years for each and every approach. This 20:1 penetration issue came as a huge surprise to air carriers around the state. Concerns about obstructions penetrating the approach surface arose over obstructions identified in the airport aeronautical surveys or sometimes due to the lack of an aeronautical survey. Both triggered closure of the non-precision approaches to night operations. After many discussions, the FAA has opted to allow the Alaska DOT and municipal airport owners a 60-day window to resolve issues before any approach is NOTAM'd not available. In addition, approach reviews were rescheduled and will resume in the spring of 2014 to permit mitigation during the summer season when Alaska has adequate daylight for corrective action. However, proactive mitigation could be enhanced with a review schedule that went beyond June 2014.

Bethel Airport Traffic Control

Bethel (BET) airport is the third busiest in Alaska, and faces safety challenges due to significant delays for landing and departing aircraft. Up to 57 aircraft have been holding awaiting landing permission. BET traffic includes Part 121 and a myriad of Part 135 operators. The Bethel airport contract tower is not equipped or authorized to manage IFR traffic and this traffic is managed through Anchorage Center. Traffic operating under visual flight rules when SVFR conditions prevail are delayed at Bethel Airport after incoming or outgoing IFR traffic. Historically, Bethel airport operated on a waiver that authorized additional procedures which mitigated these traffic delays. Today traffic can be delayed for hours quite often requiring pilots to seek refuge at alternate airports until SVFR traffic into Bethel airport can resume. Please authorize a return of the waiver or determine alternative measures to resolve SVFR traffic delays.

Availability of Weather Information

Certified weather (AWOS) is needed across the entire State at airports. The Yukon – Kuskokwim Delta priorities include immediate needs at Kwigillingok, Tununak, Newtok, Good News, and Platinum. Carriers have reported the AWOS in Platinum has been out of service for over a year. Carriers in the Bethel region have reported AWOS and RCO repairs are needed at multiple communities. Carriers must search individual community names for NOTAMs to verify conditions, yet still can't trust the information received. A current and accurate master list of facility outages would be helpful.

Carriers inform us that the few operating AWOS or ASOS are very often out of service: they can get wind but no ceiling, or vice versa. Or they can get a report of no wind, and the village agent informs them a gale is occurring. Local sources apologize and tell carriers that funding is not available to repair the broken equipment. Another specific problem is the Klawock ASOS, which is located in a terrain shadow, resulting in inaccurate readings. The anemometer readings are inaccurate and air carriers need wind for TAF. While we know that some items can be an NWS issue, to the users of the system it is immaterial which entity has ultimate responsibility: the infrastructure must be operational and reliable or lives are placed at risk. Please involve the FAA Airports Division, Tech Ops, National Weather Service and the State of Alaska, and solve long standing weather issues. It would be very helpful to have a publicly available and searchable master list (one location) with dates for scheduled repairs from Tech-Ops and NWS with new measurable goals for operability.

Safe Cross-Country Operations

OBSTRUCTIONS: Obstructions are a major threat to aviation safety. In 2011 the FAA received nearly 460 comments regarding the visibility of MET towers. Of those comments, all but three asked that marking of obstructions be MANDATORY. We and the NTSB continue to implore the FAA to not ignore the documented loss of life and the overwhelming public input for mandatory marking. We believe that safety should be of primary concern to the FAA. Obstruction lighting, marking and mapping is a priority statewide in Alaska, as much of our flying is done "off airport" and includes remote terrain. Another aviation accident involving obstructions just occurred last week and resulted in an additional four deaths.



FAA Administrator Michael Huerta
May 2, 2014
Page Three

CTAF SAFETY IN THE MAT-SU: CTAF confusion in Alaska has long existed and recently cost the lives of an entire family. AACA strongly advocates for the use of geographical landmarks for AREA CTAF boundaries and agrees that area CTAFs can reduce risk. However, carelessly applied, any CTAF boundary can contribute to INCREASED risk. Some proposed boundaries being introduced by the FAA this month for the Matanuska-Susitna Borough include arbitrary lines that bisect areas frequently traveled. This will be challenging enough, but those lines transect one of the most heavily used fisheries of the region. Without clearly-identifiable borders that use mountains or rivers, pilots are not going to adjust and additional risk can be introduced to the flying public. Regardless of the existence of clearly identifiable geographic features in the Matanuska-Susitna area, boundary lines have been drawn willy-nilly at multiple angles away from, yet often paralleling, those geographic features (river banks, for instance). The use of random lines when a definitive boundary landmark exists escapes understanding. In addition, area CTAFs around airports with FSS Stations need to be re-examined.

MOUNTAIN PASS CTAF: While there are twenty-one known mountain passes in Alaska, Merrill, Moose and Lake Clark Passes were identified for mid-air safety analyses. AACA encourages the FAA to implement recommendations from the Alaska Mountain Pass CTAF Work Group, for the three passes studied, and we urge that additional passes be examined in the near future.

Safe Condition of Aviation Infrastructure

The deterioration of runway and taxiway surfaces continues to increase risk to aircraft and crews, and threatens the safety of many Alaskan communities. Airport maintenance is challenged by extremes in weather and remote locations. Management is challenged by the lack of basic and comprehensive system plans, adequate training, and a skilled contractor workforce. Grant assurances mandate airport sponsors operate and maintain federally obligated airports yet airports struggle statewide to meet standards including pavement and gravel surfaces. Millions of federal tax dollars have been invested in Alaska airport infrastructure development but it hasn't been enough. AACA encourages the FAA to proactively encourage the State of Alaska to meet required standards.

Military Operation Area Expansion

AACA supports the mission of both the US Army and US Air Force as they modernize the capabilities of JPARC to more effectively meet the needs of their military units. When the military submits requests to the FAA, further analysis of the airspace impacts is anticipated, and AACA asks that a public comment period be allowed for all FAA recommendations on future JPARC airspace proposals.

Continued Availability of Leaded Aviation Fuel

On April 21, 2014, a new petition was filed with the EPA regarding leaded AvGas. What are the impacts you anticipate? We encourage the FAA to continue testing of unleaded fuels provided by industry.

Thank you for your work to ensure the safety of all citizens using our aviation infrastructure. As you continue your work, we ask that the FAA consider all ramifications, including safety and economic hardships, imposed upon the people of Alaska and the United States.

Sincerely yours,

Joy Journey
AACA Executive Director

Cc: Congressman Don Young
Senator Mark Begich
Senator Lisa Murkowski
Governor Sean Parnell
Greg Holt, FAA Alaska Region
Patrick Kemp, Alaska DOT&PF
AACA Board of Directors