



ALASKA AIR CARRIERS ASSOCIATION

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October 15, 2020

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Transmitted by email: steve.dickson@faa.gov, dan.k.elwell@faa.gov

RE: AACAA Safety Summit

The Alaska Air Carriers Association (AACAA) appreciates your efforts to host the Alaskan Aviation Safety Summit. AACAA strongly urges action on ideas that are supported by the operators can be funded to improve commercial aviation safety in Alaska.

AACAA wishes to highlight three areas for improvement that we believe will increase Alaskan commercial aviation safety levels: (1) Funding voluntary safety programs, (2) Expanding and improving IFR infrastructure, and (3) Strengthening the FAA Alaska Region.

(1) AACAA operators are voluntarily participating in SMS and other safety program. Although large Part 135 and 121 airlines have the resources to develop these programs internally, this is not true for many of Alaska's Part 135 operators.

AACAA believes that the path to ensuring that system safety and SMS development are within reach of all of Alaska's operators is through long term grant funding dedicated to support AACAA efforts. Our safety committee, Joint Safety, is currently exploring

(2) We have all heard the mantra of "One Level of Safety" used to justify the idea that a single national standard should apply to aviation safety issues in Alaska. However, when it comes to IFR infrastructure, including automated weather stations, ATC communications, ADSB ground based transceivers, NEXRAD radar coverage, and instrument approaches, Alaska falls far short of "One Level of Safety".

AACAA fully supports current FAA initiatives to place 8 new AWOS weather stations into service in Alaska, and encourages additional supplemental funding be allocated to further expand the deployment to 20 AWOS stations in locations that benefit the air operators.

AACAA also supports the development of VWOS technology currently being tested in Alaska, which has the potential to serve as an approved source of non-certified weather to implement provisions of the FAA Reauthorization Act championed by the congressional delegation that would allow commercial operators to conduct IFR approaches by using suitable risk mitigation.

Further, AACA fully supports the collaboration of FAA Tech Ops and FAA Flight Standards to develop an Alaskan certified AWOS stations at a cost below the current AWOS installed cost in Alaska of \$2M each.

AACA urges the FAA to fill the gaps in Alaska's ATC communications and ADS-B ground based transceiver network, and to expand NEXRAD radar coverage to include the North Slope, the Alaska Peninsula and Eastern Aleutians, and gaps in populated areas of the Interior.

The commercial operators encourage FAA to embrace new technological advances where applicable. With adequate training, Alaskan air operators could realize a higher level of safety.

(3) AACA proposes organizational reform that includes a strengthened Alaska Region with the authority to advance initiatives specific to Alaska's unique geographic, weather, and infrastructure challenges. We believe that an FAA that is more responsive to local needs, along with internal promotion of the "Compliance Philosophy", will foster an improved safety partnership between the FAA and Alaskan operators.

Finally, we have all participated in safety summits, the most recent hosted by NTSB Chairman Robert Sumwalt. Many good ideas from all parties come out in these summits, but few are enacted. We strongly urge action on any ideas that we all agree can help to improve commercial aviation safety in Alaska.

If you have questions, please don't hesitate to call Jane Dale at 907.717.6724.

Sincere regards.



Matt Atkinson
President, AACA



Jane Dale
Executive Director, AACA