



National Transportation Safety Board

Washington, DC 20594

Safety Recommendation Report

Revise Processes to Implement Safety Enhancements for Alaska Aviation Operations

The National Transportation Safety Board (NTSB) is providing the following information to urge the Federal Aviation Administration (FAA) to act on the safety recommendation issued in this report. This recommendation is derived from discussions during our September 2019 Most Wanted List Roundtable: *Alaska Part 135 Flight Operations – Charting a Safer Course*.¹ Information supporting this recommendation is discussed below.

Background and Analysis

Because the NTSB continues to investigate the same types of accidents involving Title 14 *Code of Federal Regulations (CFR)* Part 135 flight operations in Alaska, we convened, in September 2019, a panel of Part 135 operators, safety experts, and government officials to discuss what can be done to address Part 135 safety issues in the state.² Although the roundtable focused on Part 135 operations, some of the proposals discussed, such as improved pilot training (particularly concerning CFIT avoidance) and consistently managing weather risks, are applicable to all operations in Alaska, which has a higher overall aviation accident rate than the rest of the United States. Specifically, for the period from 2008 to 2017, the total accident rate in Alaska was 2.35 times higher than for the rest of the United States; the fatal accident rate in the state was 1.34 times higher.³

While multiple solutions have been proposed to improve aviation safety in Alaska, during the roundtable, participants discussed studies and plans that had been started by various parts of the FAA's organization or industry stakeholders to enhance the safety of Alaska aviation operations but had stalled. For example, the RTCA's August 2017 report, *Recommendations for the Performance Based Navigation (PBN) Route System*, (which was completed at the FAA's direction) contained 23 recommendations for improving Alaska flight operations.⁴ It wasn't until 2019 that the FAA requested a feasibility study of the recommendations, which has since been delayed further. One roundtable participant, a member of the FAA's Navigation Programs senior management team, suggested that FAA staffing reorganizations in Alaska and a lack of

¹ The roundtable was led by the chairman of the NTSB, and the proceedings were transcribed. The transcript is available in the public docket for this event (NTSB number DCA19RT001) at <https://dms.nts.gov/pubdms/>.

² Controlled flight into terrain (CFIT), loss of control in-flight, midair collision, and unintended encounter with instrument meteorological conditions comprised about 80% of fatal Part 135 accidents in Alaska from 2008 to August 2019.

³ The FAA didn't publish flight activity for 2011, which isn't included in the data for this period.

⁴ Transcript of proceedings, p. 168.

coordination between FAA and industry safety initiatives were significant factors in the lack of progress in realizing safety enhancements from this study.⁵

Concerning a lack of coordination, the essence of several comments from roundtable participants was that the “silo”-like nature of the FAA’s organization often made it difficult to develop a comprehensive plan for implementing and maintaining various safety efforts in Alaska, including potential consequences and costs for other parts of the organization; a recurring theme was that a safety “focal point” within Alaska was needed.⁶ The manager of the FAA’s Planning and Requirements group offered as an example the recent decision to purchase more automated weather observing systems (AWOS) for Alaska, as part of the FAA’s reauthorization. Though funds had been earmarked to acquire new AWOSs, no funding was available for ongoing maintenance. The manager observed that “when we make decisions or we get things implemented, there’s consequences that roll down the hill...that all have to be thought out.”⁷ Another participant similarly stated that stakeholders in Alaska “need to make sure we’ve got somebody at the FAA that can coordinate across different parts of the FAA to get something done.”⁸

The longstanding effort to increase instrument flight rules (IFR) operations in Alaska is another area that continues to meet with obstacles.⁹ The director of operations for an Alaska carrier stated that despite the increased availability of instrument approaches, the inability to comply with current FAA flight standards that are required throughout the United States, such as weather reporting requirements and terminal instrument procedures, render the approaches unusable for many operators.¹⁰ A possible remedy would be to adjust the FAA’s flight standards for Alaska to accommodate its unique aviation environment, which is a risk management decision requiring extensive knowledge of the environment; yet such an adjustment has yet to even be evaluated.

The safety programs noted above are examples of programs that could potentially address accidents involving CFIT and unintended encounters with instrument meteorological conditions. The NTSB is also aware of several safety enhancements drafted by the General Aviation Joint Steering Committee (GAJSC) that are focused on reducing CFIT accidents in general aviation, which would also benefit Alaska operations.¹¹ The NTSB believes that a revised FAA process for implementing safety enhancements in Alaska could better ensure the Alaska aviation industry’s needs are appropriately considered and included in the broader GAJSC safety enhancement program. Thus, the NTSB concludes that the FAA’s failure to fully implement needed safety programs in Alaska has resulted in aviation safety issues in Alaska persisting. Therefore, the NTSB recommends that the FAA work with stakeholders that service the Alaska aviation industry to

⁵ Transcript of proceedings, p. 169.

⁶ Transcript of proceedings, pp. 174, 175, 182, and 205.

⁷ Transcript of proceedings, p. 185.

⁸ Transcript of proceedings, p. 183.

⁹ The NTSB’s 1995 safety study, [Aviation Safety in Alaska](#), identified inadvertent VFR flight into IMC as the leading safety problem for Alaskan commuter and air taxi flights for the review period. The category continued to account for about a third of fatal Part 135 accidents from January 2008 to August 2019; inadvertent VFR flight into IMC accounted for about 12% of all fatal aircraft accidents in Alaska for the same period.

¹⁰ Transcript of proceedings, pp. 151-152.

¹¹ The GAJSC is “a public-private partnership working to improve general aviation safety” and “uses a data-driven, consensus-based approach to analyze aviation safety data and develop risk reduction efforts through implementation of GAJSC sponsored, safety enhancements.”

implement a safety-focused working group to review, prioritize, and integrate Alaska's aviation safety needs into the FAA's safety enhancement process.

Recommendation

To the Federal Aviation Administration

Work with stakeholders that service the Alaska aviation industry to implement a safety-focused working group to review, prioritize, and integrate Alaska's aviation safety needs into the FAA's safety enhancement process. (A-20-11)

BY THE NATIONAL TRANSPORTATION SAFETY BOARD

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