



## ALASKA AIR CARRIERS ASSOCIATION

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25 January 2014

Senator Donald Olson

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via email to [david.scott@akleg.gov](mailto:david.scott@akleg.gov)

**SUBJECT: SENATE BILL SB 53 AS 02.35.110 "Emergency Rations and Equipment"**

Dear Senator Olson:

The Alaska Air Carriers Association (AACA) sincerely appreciates your efforts to introduce and pass Senate Bill SB 53, *An Act exempting specified aircraft operators from certain requirements related to emergency rations and safety equipment*. This proposed change will bring the statute into compliance with current safety standards.

It is our position that since its inception, this statute has lacked clear language and consistent legal interpretation from the State of Alaska and legal experts. That resultant ambiguity has led to broad confusion among commercial operators and enforcement agencies with regard to applicability and intent of this statute.

Part of the confusion has been in determining if this statute shall apply to all air traffic flying through Alaskan airspace, including international flights of large transport category aircraft originating/terminating outside the state of Alaska; or is it only intended to apply to flights operating entirely 'within' Alaskan airspace? Additionally, as satellite-based flight-locating technology has recently evolved, aircraft with that new equipment onboard are now able to be instantly located and identified when an unplanned landing does occur.

We are pleased that SB 53 has been referred to the Senate Transportation Committee and in progressing this session. AACA offers any support we can provide to help in the passage of this very timely and necessary bill.

The Alaska Air Carriers Association has represented the interests of aviation businesses in Alaska since 1966. Our members carry over 97% of the passengers and cargo transported in the State. They own, operate, and service aircraft, providing for the needs of the traveling public through scheduled commuter operations, flight tours, on-demand air charters, fuel sales, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, and emergency medical evacuation.

The AACA Joint Safety Committee is composed of representation from the NTSB, DOT&PF, FAA, the University of Alaska, the Medallion Foundation, AACA, and carrier safety officers.

Thank you for considering action on this very challenging topic that threatens business viability. Our carriers sincerely want to comply with the regulation, but its ambiguity results in their continued precarious vulnerability.

Sincerely,

Robert Hajdukovich, Chair  
AACA Joint Safety Council