

January 29, 2014

Senator Donald Olson PO Box 1630 Nome, AK 99762-1630 <u>via email to:</u> david.scott@akleg.gov

Re: Era Aviation's endorsement of SB53, modifying AS 02.35.110 "Emergency Rations and

Equipment"

Dear Senator Olson:

Era Aviation enthusiastically endorses passage of SB 53 as designed to modify AS 02.35.110 "Emergency Rations and Equipment" requirements for carriage on aircraft operated in Alaska.

Existing language contained in AS 02.35.110 has been a source of confusion amongst aircraft operators and pilots for many years. Applicability of the statute appears to cover <u>all</u> aircraft operations in the Alaska skies; some believe that includes over-flights of transcontinental routes and military aircraft. It is unknown if the original authors of AS 02.35.110 truly intended the statute to be applicable to the large transport category aircraft in widespread use throughout Alaska today.

Era Aviation, like all scheduled airlines operating in Alaska, is already required by Federal Aviation Regulations (14 CFR 121.353) to carry specialized emergency equipment and survival kits onboard each of its flights operated in Alaska. All contents of this Alaska-specific equipment are FAA-approved for each aircraft type and route in Alaska and now accounts for over 100 pounds of additional weight on each of our 37-passenger Bombardier Dash 8 aircraft. Era believes that compliance with the FAA's regulations provides adequate safeguards and protections for all aircraft occupants in the event of a remote aircraft emergency. Although several required items are duplicated between the federal regulations and state statutes, full compliance with AS 02.35.110, as currently understood, adds up to additional 100 pounds of equipment on each of Era's 37-seat aircraft. Applying that same basic weight assumption to even larger aircraft, full compliance with AS 02.35.110 might be expected to add 500-600 pounds of supplemental equipment to a Boeing 737, decreasing payload available for revenue flights.

SB53 acknowledges the positive impact of technological advancements in satellite flight-following and emergency locator transmitters used by most airlines to track all aircraft in the air and on the ground in real-time. Knowing where every aircraft is located at every point during flight operations and having unique tail-number specific emergency locator transmitters installed are essential to instantly identify the location of any aircraft accident and then promote a quick response by emergency personnel whenever necessary. Airlines or individual aircraft owners that choose to install this advanced equipment on their aircraft should be allowed to avoid doubling-up on survival equipment components for flights in Alaska to meet two generally parallel state and federal regulations.



<u>Era Aviation urges adoption of SB53</u> which provides increased clarity in the statute's applicability and recognizes the importance of modern advancements in the aviation industry for those operators that choose to take advantage of the capabilities of that equipment.

Best Regards,

Jeff Sharp VP, Operations Era Aviation