

1200 - HJR 71 SSA

CASA 212 no. sits idle on the ground and, absent the exemption sought here, can be expected to remain idle indefinitely. This aircraft represents a \$1,400,000 investment for Air Logistics, and the loss of its use extracts a continuing daily penalty in terms of lost revenues and fixed expenses which continue to accrue. Indeed, if the requested exemption is not shortly forthcoming, Air Logistics will be forced to seriously consider disposing of this aircraft. This will be doubly unfortunate since, in addition to depriving Air Logistics of the profits which could be obtained from the operation of advanced fixed wing equipment, disposal of this aircraft would at the same time detract from the air service that could be offered in the bush by fixed wing equipment. For these reasons, Air Logistics submits that good cause exists under FAR 11.27 to process this exemption request without the publication and comment procedures which would otherwise apply. Nonetheless, in compliance with FAR 11.25(d), Air Logistics submits the following summary information in proper form for publication in the Federal Register:

1. Citation of each rule from which relief is requested: FAR 135.385(b) and (c);
2. Brief description of the general nature of the relief requested: Air Logistics requests that it be relieved of the obligation to comply with FAR's 135.385(b) and (c) to the extent necessary to permit it to operate CASA 212 aircraft with due regard to the landing limitations set forth in its Aircraft Flight Manual. Air Logistics further requests that its Operations Specification be revised accordingly.

10. In conclusion, Air Logistics reiterates that the grant of the limited exemption requested here will not adversely affect safety in aviation and yet at the same time will serve to promote civil aeronautics in the public interest. In particular, Air Logistics would note the emphasis which has been recently placed by the Congress and the Carter Administration upon maximizing competition in civil aviation. Congressional and Administration policy at this time clearly recognizes that the public interest is best served by the removal of unnecessary regulatory restrictions so as to maximize the degree of competition available in air transportation, thus providing the highest degree of service to the public. As noted above, the denial of this exemption request would effectively remove the most advanced STOL aircraft from the Alaskan market. This will be a serious detriment to competition, Air Logistics, and the public at large. Since the regulatory restrictions which are involved in this case are not necessary for safety, there would seem to be no justification for applying these restrictions to

the CASA 212 aircraft and every public interest justification for removing them. Accordingly, Air Logistics of Alaska respectfully requests that the Federal Aviation Administration grant the exemption requested in this petition as soon as possible.

Respectfully submitted,

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Re Docket No. 19498

SUPPLEMENT NO. 1 TO PETITION OF AIR LOGISTICS OF ALASKA

Air Logistics of Alaska, Inc. hereby submits this Supplement to its Exemption Petition in Docket 19498 for the purpose of further defining the scope of the exemption relief sought, and providing additional information for consideration by the FAA in ruling upon the merits of that petition.

1. Air Logistics continues to believe that its original exemption request in Docket 19498 is fully justified due to the unique nature of its CASA-212 aircraft, the public interest in service by that aircraft in Alaska, and considerations of safety equivalency. Nonetheless, Air Logistics wishes to advise the FAA that a substantial portion of the operational problem discussed in more detail in its original petition in this docket could be resolved by granting exemption relief similar to that originally requested in this proceeding but restricted to an exemption from only the 60 percent and 70 percent restrictions of FAR 135.385, applicable only to day VFR, cargo-only operations within the State of Alaska. Air Logistics believes that an exemption of the type

discussed herein is the minimum relief which would provide a realistic opportunity for permitting service by its CASA-212 aircraft in the Alaskan bush markets on an economically viable basis.

2. Air Logistics' CASA-212 is plainly a unique aircraft, both because of its unparalleled short-field landing characteristics for an aircraft of its size, as well as its design and equipment which provide a degree of reliability and safety which, as far as Air Logistics is aware, far exceeds that of any other aircraft operated under FAR 135, at least in the Alaskan market.

Air Logistics has already brought to the FAA's attention the information contained in the Aircraft Flight Manual for the CASA-212 as approved by the Spanish civil aviation authority (Instituto Nacional de Tecnica Aeroespacial) demonstrating the CASA-212's remarkable short-field capabilities in supervised flight tests. Air Logistics has also demonstrated that the landing and take-off performance of the CASA-212 in fact more closely compares with aircraft that operate without the landing limitations imposed by FAR 135.385. It is not, however, necessary to rely solely upon flight manual provisions and statistical data to demonstrate the CASA-212's operating capabilities. The following table summarizes statistical information concerning landings that have been made by Air Logistics utilizing its CASA-212 in public aircraft service:

SQUIRE, SANDERS & DEMPSEY

-3-

<u>Airfield Length</u>	<u>No. of Landings</u>
1,750 feet & less	58
1,751 to 2,000 feet	53
2,001 to 2,500 feet	49
2,501 to 3,000 feet	39
3,001 to 3,500 feet	13

(Source: Company records)

These operations have been performed without accident or incident, operating under the command of four different Air Logistics captains. Air Logistics believes that these operational statistics forcefully demonstrate that its CASA-212 aircraft can be operated into landing fields significantly shorter than those to which the aircraft would be relegated in civil aircraft service by virtue of the full panoply of present FAR 135.385 restrictions.

The CASA-212's safety record in worldwide operations has also been an exemplary one. At the present time, Air Logistics understands that there are approximately 154 CASA-212 aircraft in operation throughout the world, with the most extensive utilization being in South and Central America, Africa, the Middle East, Indonesia, Malaya, Thailand, India, and Spain and Portugal. Thus far, these CASA-212 aircraft have logged approximately 110,000 hours without a major accident or fatality.

The reason for this fine safety record is first and foremost the basic design philosophy of the aircraft. At every phase of design, emphasis was placed upon simplicity and reliability. Thus, for example, as previously noted the

CASA-212 does not utilize special "STOL" control settings for short-field operations. Instead, short-field performance is built directly into the aircraft design and does not require the use of special equipment or settings with the concomitant risk of failure. Additionally, where the manufacturer has purchased components for the aircraft abroad (and indeed a large portion of the CASA consists of U.S.-manufactured components) the emphasis has consistently been upon quality and proven performance.

The aircraft's turbopropeller engines and propeller reversing systems are excellent examples of the manufacturer's emphasis upon reliability and simplicity in design. The CASA-212 is powered by two Garret TPE-331-5 engines. Garret maintains records of inflight engine shutdowns by engine series and has advised that at the present time the lowest rate for a series has been zero and the highest .172 inflight shutdowns per 1,000 hours. The series which is utilized on the CASA-212 has had a shutdown rate of .08 per 1,000 hours. In fact, Air Logistics has never experienced an inflight shutdown of the engines on its CASA-212 equipment. Air Logistics' captains have accumulated approximately 20,000 hours in Garret-powered aircraft without ever experiencing an in-flight shutdown.

The CASA-212's propeller reversing system also illustrates the simplicity and reliability which typify the design of this aircraft. The reversing system is operated by

a direct mechanical linkage from the cockpit to the internal reversing mechanism. As a result of this design, Air Logistics has been informed by the manufacturer that there has never been a failure of the reversing system of the TPE-331 engine due to internal engine or propeller causes and Air Logistics has never experienced such a failure. The fundamental point is that the CASA-212 is an FAR 25 aircraft and has been designed to meet the more stringent requirements of that part. This has been done with a deliberate design philosophy of choosing the simplest and most reliable means of accomplishing each function necessary to the safe operation of the aircraft.

While the CASA-212 is deliberately simple in its design, it is also highly sophisticated in its instrumentation. For example, Air Logistics' CASA-212 aircraft is equipped with fully redundant navigation and communication equipment. Thus, there are dual Sperry VHF transceivers, dual Collins VHF navigation equipment providing VOR, DME, and ILS capabilities, dual transponders equipped with altitude encoding, and Bendix mapping and weather radar. There is also a complete set of dual flight instruments powered by dual Tarson gyroscopes. Under normal conditions, individual gyros drive the Captain's and copilot's instruments, although in the case of failure of either gyro, the remaining one can be selected to drive all instrumentation. The horizontal gyros are driven by two gyro-stabilized flux-gate compasses and utilize a

selection system of the type discussed above. In addition to the horizontal gyros, there are two radiomagnetic indicators. The aircraft is also equipped with a Sperry Stars direction system. As far as Air Logistics is aware, no other aircraft operated by any Part 135 carrier is comparably equipped, and indeed this instrumentation is believed to be better than that of many aircraft utilized by Part 121 operators.

Additional safety equipment is also under consideration at the present time. CASA has requested Goodyear to develop a prototype non-skid breaking system for the CASA-212 aircraft and has indicated that if this system results in a significant improvement in landing roll distances it will be made available to customers. Consistent with its commitment to the highest degree of safety, Air Logistics intends to purchase a non-skid breaking system for its CASA equipment if that system is proven to be reliable and effective.

As the foregoing illustrates, the CASA-212 is truly a unique aircraft. Air Logistics is not aware of any other equipment presently available on the commercial market which offers a similar combination of payload capacity, short-field operating characteristics, design simplicity and reliability, sophisticated instrumentation, and proven short-field operating characteristics. Air Logistics requests that the FAA recognize this uniqueness in evaluating its exemption request in Docket 19498.

3. Air Logistics also submits that concerns of safety equivalency should present no barrier to the granting of the requested exemption in view of the narrowness of the relief requested, the uniqueness of the aircraft involved, and Air Logistics' own operating and training policies and procedures.

At the outset it should be noted that the exemption request being made by Air Logistics as further defined in this Supplement is an exceedingly narrow one. It is restricted to operations within the State of Alaska since it is in that state where the bush market and the particular operational problem which led to the filing of this exemption request are most prevalent, and also because Alaska is the base of Air Logistics' flight operations. The FAA has recognized on several occasions in the past that the special operating environment of Alaska requires adjustments in operational procedures otherwise applicable on a nationwide basis, and Air Logistics submits that these previous FAA actions offer ample precedent for the granting of relief as requested herein, restricted to the Alaska market.

Secondly, Air Logistics is no longer requesting exemption relief from the 50 foot height requirements of FAR 135.385. Thus, its short-field operations in Alaska with the CASA-212 aircraft would, if the requested exemption were granted, have the additional margin against short landings or failure to clear obstructions which the 50 foot rule is designed to provide.

Restricting exemption relief to day VFR operations, if considered necessary by the FAA, would add a further safety margin. It is widely recognized in the aviation industry that pilots are capable of making shorter landings under day VFR situations than other operating modes and thus this limitation would provide an additional margin of safety. Finally, by restricting exemption operations to cargo flights, the FAA would also be limiting the potential consequences of an accident no matter how remote the actual possibility of the accident is.

A second factor bearing on safety equivalency is the design philosophy, construction, and equipment which has been built in to Air Logistics' CASA-2 aircraft as discussed above, all of which serve to reduce significantly the possibility of accidents or incidents, and thus lessen the need for additional operating restrictions in order to operate the CASA-212 aircraft in a safe manner. That these design, manufacturing, and instrumentation features serve their designated purpose has been amply demonstrated by Air Logistics' fine operating record concerning this aircraft in Alaska, as well as the aircraft's excellent worldwide operating history, as discussed above.

A final factor is Air Logistics' operating and training and policies and procedures. As a matter of policy, Air Logistics has been highly selective in choosing individuals to serve as its captains and has made a deliberate effort

to offer top incentives and benefits in order to employ the very best available personnel. At the present time, all of Air Logistics' CASA captains are ATP certificated, have at least 13,000 hours flying time, and a minimum of 2,000 hours in aircraft powered by Garret engines. With one exception, all of these pilots completed more than 100 hours in type before functioning as a captain in commercial operations.

These select flight personnel are subjected to a training program which substantially exceeds the requirements of FAR 135. Air Logistics' original training procedures were designed to meet Part 121 standards and have not been substantially changed since the recent comprehensive revision of Part 135. Attached to this Supplement is a copy of Air Logistics' present CASA-212 Ground Training Manual which demonstrates the unusual thoroughness of Air Logistics' ground training procedures. Also included is a copy of Air Logistics' approved Operations Manual, which includes as Appendix A Air Logistics' CASA flight training manual. Finally, as a further implementation of its concern for safety Air Logistics is presently considering the development of a further very thorough set of standard operating procedures to supplement these documents.

In summary, Air Logistics believes that safety equivalency is established first by the uniqueness of its CASA-212 aircraft, second by Air Logistics' own stringent attitudes on safety matters, and third, by the narrowness of

-10-

the exemption relief requested. Air Logistics is truly a unique carrier operating a unique aircraft under unique circumstances. It submits that proper recognition of these factors by the FAA fully justifies the limited exemption relief that is being requested.

4. Finally, Air Logistics reiterates its belief that the public interest in an air transportation system capable of serving the needs of Alaska clearly mandates the granting of appropriate exemption relief in this case. In this connection, it should be noted that it is not Air Logistics' contention that the financial burden which it incurs due to its inability to operate its CASA-212 equipment into short airfields in civil operations in and of itself establishes the public interest justification for grant of an exemption in this proceeding. While Air Logistics feels that such factors are proper ones for consideration by the FAA, Air Logistics believes that the broader public need of the State of Alaska for improved air transportation services is the clearest public interest justification for the exemption requested herein. As has previously been demonstrated to the FAA, Alaska is the largest state in the Union in terms of geographic area. While slightly more than half of its population is concentrated in the three metropolitan centers of Anchorage, Fairbanks, and Juneau, the remainder of Alaskan populace is largely spread throughout the relatively remote Alaskan bush area. Much of the Alaskan bush is not readily

-11-

accessible by surface transportation during all or a substantial portion of the year, and thus these bush communities typically depend heavily on air transportation, not simply for discretionary travel or luxury goods, but also for basic necessities, and important equipment and supplies. Air Logistics' CASA-212 is ideally suited to serve these bush markets in that it offers a payload capacity and cargo-hold size which exceed those otherwise normally available at Alaskan bush airstrips. It is thus particularly useful for the carriage of large, heavy shipments, or outsized articles such as construction supplies. As Air Logistics has demonstrated in its prior submissions in this docket, there can be no question that there is a public need for the type of service which Air Logistics and its CASA-212 aircraft are equipped to provide. Obviously, this is a problem which will not diminish but rather which will gain additional importance as more of Alaska's natural resources are made available for exploration, development, and production. Additionally, Air Logistics would note that the native Alaskans who live in bush communities served by short airfields are in many cases attempting to establish better dwellings, to procure more goods and services, and generally to elevate their living standards. Air Logistics believes that its CASA-212 is well suited to assist in meeting this demand.

A recent case in point is the State of Alaska's efforts to build schools, hospitals, and community facilities

in bush areas. In 1979 Alaska inaugurated a \$250 million construction program designed to improve these facilities; however, this program was not fully successful in part, Air Logistics believes, because of the difficulty of transporting essential construction materials to these remote areas. [To cite one example, as far as Air Logistics is aware, the CASA-212 is the only aircraft presently in Alaska capable of carrying long support beams into these short airfields]. A similar construction program of even larger proportions is presently contemplated for 1980; however, it is clear that adequate air transportation will be essential to its prospects for total success. Air Logistics believes that its CASA-212 equipment can fill a void which might otherwise exist in the transportation needs of this type of program.

Considerations of more general aviation policy, as previously discussed in Air Logistics' exemption petition also support the grant of the limited exemption relief requested herein. As noted previously, the present aviation policies of the Carter Administration and the United States Congress strongly favor the maximization of competition in aviation markets both domestically and internationally. This policy can only be implemented if federal agencies are willing to demonstrate administrative flexibility in cases where the facts warrant such action. Air Logistics submits that its application in Docket 19498 presents exactly such a case. By granting the exemption requested herein, Air Logistics submits

SQUIRE, SANDERS & DEMPSEY

-13-

that the FAA would be maximizing the availability of high quality air transportation to the people of the Alaskan bush without at the same time compromising justifiable safety concerns. To deny this application would be to unnecessarily stifle competition in the bush markets and to deprive the people of the Alaskan bush of the best air service which can presently be made available to them. Accordingly, Air Logistics renews its request for appropriate exemption relief as discussed in its original petition in this docket as well as in this Supplement.

Respectfully submitted,

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Dated: November 2, 1979

HJR

> /

COMMITTEE REPORT
SENATE

FURTHER: None

3/12/80

Date: April 10, 1980

Mr. President:

The Committee on STATE AFFAIRS has had HJR 71
Begich-Boggs Visitor Center

under consideration and (a majority of the committee) (the committee) reports it back with the following recommendations:

- do pass do not pass
- do pass with attached amendments(s)
- replace with CS for _____ same title
 new title
- and recommends _____
- AND attaches a "Letter of Intent" New Fiscal Note
- reports it back without recommendation
- referred to the _____ Committee

MEMBERS SIGNING
DO PASS

MEMBERS HAVING
OTHER RECOMMENDATIONS:

3

Bob Mulcahy

Neil Koberg

Bob Mulcahy

CHAIRMAN

Introduced: 2/18/80
Referred: State Affairs

1 IN THE HOUSE

BY CARNEY

2 HOUSE JOINT RESOLUTION NO. 71
3 IN THE LEGISLATURE OF THE STATE OF ALASKA
4 ELEVENTH LEGISLATURE - SECOND SESSION

5 Relating to the Begich Boggs Visitor
6 Center.

7 BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:

8 WHEREAS the Portage Glacier, near Anchorage, is an outstanding natural
9 feature; and

10 WHEREAS Portage Glacier is one of the few glaciers in the world which is
11 located near and is easily accessible from a major population center; and

12 WHEREAS the U.S. Forest Service is planning the construction of a
13 visitor center at the foot of the glacier; and

14 WHEREAS the Forest Service plans to use the visitor center for its
15 various interpretive activities, including the display of a film depicting
16 the glacier during different seasons of the year; and

17 WHEREAS the visitor center will be named after Congressman Nick Begich
18 and House Majority Leader Hale Boggs, lost in a plane crash while in the
19 service of Alaska and the nation; and

20 WHEREAS Congress has not yet authorized the construction of this visitor
21 center or appropriated funds for it;

22 BE IT RESOLVED BY the Alaska State Legislature that it respectfully
23 requests the United States Congress to authorize and appropriate funds for
24 the construction of the Begich-Boggs Visitor Center at Portage Glacier.

25 COPIES of this resolution shall be sent to the Honorable Ted Stevens and
26 the Honorable Mike Gravel, U.S. Senators, and the Honorable Don Young, U.S.
27 Representative, members of the Alaska delegation in Congress.

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**Kramer, Chin
& Mayo, Inc.**



The Juneau Marine Park

Juneau, Alaska

Juneau, Alaska

Juneau, Alaska

Juneau, Alaska

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The Reginald Buggs Visitor Center

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Juneau, Alaska

determine their capability to handle additional waste loads. Final design and construction documents will be prepared.

The building will be situated on the lake shore on a terminal moraine (the mound of earth and stones deposited by a glacier as it begins to recede). From an observation platform constructed in the lake and reached by pedestrian bridges, visitors will have an exceptional view of icebergs and of the glacier.

During the preliminary design, KCM considered architecture, landscape, mechanical and electrical systems, and site utilities. KCM's design includes a large exhibit area, a 200-person capacity theater, and an orientation area with a refrigerated display space to contain a piece of Portage Glacier ice for visitors to see and touch.

Because the visitor center will be a very prominent site, careful consideration was given to the relationship between the physical structure and its surrounding environment. The building's exterior will be finished with a light-colored, textured, and sculptural concrete. The building's design and placement were chosen so

that they blend into the physical site. Earth mounds will soften the transition from nature to manmade objects. The building's architectural design continues this harmonious feeling. Walls will be rough textured concrete, colored to be compatible with the surrounding landscape. Rounded corners will further soften the building forms.

KCM recommended that landscape plantings be of seedlings grown to cones gathered at the site and of native cuttings from indigenous plants so as to blend with the stark natural landscape and to adapt to the site's poor soil and severe wind and temperature conditions. In addition, native growth was planted within a perimeter of the mound that forms the base of the building and just to the north.

KCM also recommended that weathered rock mounds be placed within the building's perimeter to soften the building's appearance. The mounds will be placed to soften the building's appearance and to adapt to the site's poor soil and severe wind and temperature conditions. In addition, native growth was planted within a perimeter of the mound that forms the base of the building and just to the north.



FIGURE 1. ELEVATION



FIGURE 2. ELEVATION



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