



DENVER
THE MILE HIGH CITY

October 31, 2009

Mr. Bill English
Lead Investigator
NTSB AS-10
490 L'Enfant Plaza
Washington, DC 20594

Re: Continental Flight 1404, Denver International Airport

Mr. English,

Thank you for giving us the opportunity to comment on the NTSB docket regarding the Continental Airline's flight 1404 crash at Denver International Airport on December 20, 2008. This is DIA's second submittal of comments complimenting our original document dated October 2, 2009 which addressed the Survival Factors Group Chairman's Factual Report. In addition, we are providing the following comments on the Air Traffic Control Factual Report for your consideration:

Page 28: "Once the CIC realized his mistake, he attempted to call the crash crew via the crash phone to correct the information, but did not get a response from the crash crew."
Page 30: "Almost immediately he was apprised that "WC" was more accurate than "WB" and he attempted to redial the crash crews, but no one answered or picked up the line. When asked how the crash phone worked he explained that you pick up the receiver, push the "activate" button, and speak on the open line. He tried to call a few more times without success. He was not sure if the line could have remained open from the previous call."

Comments: Our review of the audio recording of the Crash Phone for COA1404 is that the FAA Tower did not hang-up from their original call, causing the controller to be unable to re-activate the system. Even if he had been able to reactivate the system, the ARFF crews would not have received the information because the crews were already in the ARFF rigs responding to the accident scene. It would have been more efficient if the CIC had contacted the Airport Operations Duty Manager (Ops 7) on the City of Denver's radio system. Airport Operations staffing monitors the radio system 24 hours a day, 7 days a week on this frequency.



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Page 23: "At 1820 runway 34R was closed by the tower to allow emergency ARFF vehicles to respond to the accident".

Comments: At 1820, FAA Tower coordinated with Ops 7 to close runway 34R to allow emergency vehicles to respond to the accident.

Page 26: "...departing aircraft, runway 26 was restricted from use. This was followed by the closing of runway 25"

Comments: Runway 25 was closed by Ops 7. The response route from ARFF 1 included taxiways: TWY G, TWY F, and TWY WA. As a result, Ops 7 closed Runway 25 in order to expedite vehicles responding to the scene of the accident. The entire west side of the airport was closed.

Page 27: "Mr. Hedeem advised Ops 7 that runway 34R was closed and authorized emergency vehicles access to the runway for emergency response"

Comments: This information from the FAA Tower Controller, Mr. Hedeem, was simultaneous with Ops 7 closing Runway 34R for the accident and access for emergency vehicles.

Page 29: "Within a few minutes runway 25 was closed due to all the emergency vehicles on the southwest corner of the airport and airport operations being uncomfortable with the situation."

Comments: As stated earlier, Runway 25 was closed by Ops 7. The response route from ARFF 1 included taxiways: TWY G, TWY F, and TWY WA. As a result, Ops 7 closed Runway 25 in order to expedite vehicles responding to the scene of the accident. The entire west side of the airport was essentially closed. "Operations being uncomfortable" was never stated.

Thank you again for giving us the opportunity to comment on the docket. Please do not hesitate to contact me if you have any questions and/or comments.

Sincerely,



Denver Airport Traffic Control Tower and City and County of Denver

LETTER OF AGREEMENT

EFFECTIVE: FEB 15 2002

SUBJECT: Emergency Procedures for Denver International Airport

1. **PURPOSE:** This Letter of Agreement (LOA) between Denver (DEN) Airport Traffic Control Tower (ATCT) and the City and County of Denver (CCD) establishes procedures for the dispatch and operation of emergency vehicles on the movement area of Denver International Airport. Changes are depicted by using a solid black line in the right hand margin.

2. **SCOPE:** This agreement is applicable to all DEN ATCT personnel, Airport Operations Management (OPS) personnel, and City and County of Denver Airport Rescue and Fire Fighting (ARFF) personnel.

3. **CANCELLATION:** DEN ATCT and CCD LOA, *Emergency Procedures for Denver International Airport*, dated April 5, 1997, is canceled.

4. **DEFINITIONS:**

a. **Amber Alert** – A situation where an aircraft is experiencing difficulties while in the air, attempting to land, or a possible emergency which could result in injuries to personnel, damage to equipment, or damage to property.

b. **Red Alert** – An aircraft crash, or other serious event, which threatens life or property on or near the airport; a situation where advance notice is received of an incident/event which indicates a high probability of an accident.

c. **Incident Runway** – The runway the emergency aircraft will use.

d. **Set Up Position** – Location of equipment responding to the incident runway.

e. **Airport Operations Management** – The Airport Operations Manager (Call sign- OPS 7) is the Airport Incident Commander.

f. **Red Lead** – The ARFF official in charge of fire suppression and rescue.

g. **Red Chief** – The Officer of Denver Fire Department that may serve as Red Lead.

h. **Red Vehicle** – ARFF emergency equipment. Each vehicle is identified by the word "Red" followed by the vehicle number.

i. **Show Water** – A term used to indicate to ARFF crews that water is to be discharged from vehicles upon arrival during ARFF certification tests.

5. **RELATED PUBLICATIONS:**

a. Denver Airport Traffic Control Tower and City and County of Denver Letter of Agreement, *Jurisdiction of Movement Area*.

b. FAA Order 7110.65, Air Traffic Control, Chapter 10, *Emergencies*.

c. FAA Order 7210.3, Facility Operation and Administration, para. 2-1-9, *Airport Emergency Plans*.

d. Denver International Airport, *Surface Movement Guidance and Control System (SMGCS) Plan*.

e. Denver International Airport, *Airport Certification Manual, Emergency Plan*.

f. City and County of Denver Department of Aviation, *Rules and Regulations of the Denver Municipal Airport System*.

6. RESPONSIBILITIES:

a. To the maximum extent possible, DEN ATCT shall give priority to airport emergency equipment responding to alerts.

b. DEN ATCT shall alert airport emergency equipment when, in the opinion of any one of the following, a potential or actual emergency exists:

- (1) ATCT specialist on duty.
- (2) Pilot of the aircraft concerned.
- (3) Aircraft operator or their representative.
- (4) Representative of airport management.

c. DEN ATCT shall immediately notify Airport Operations Management (OPS 7) (using the emergency crash net) of aircraft emergencies or incidents involving hazardous cargo, bomb threats, or hijacks. The primary parking area for these aircraft will be TWY EC, near the bomb building, or as directed by the Airport Operations Manager (OPS 7).

d. Upon notice of alert by DEN ATCT, the dispatch of ARFF emergency equipment shall be the joint responsibility of the Airport Operations Management (OPS 7) and Red Lead. After receiving the alert, fire suppression and rescue efforts are the responsibility of Red Lead. The Airport Operations Manager (OPS 7) will be the Incident Commander for Denver International Airport.

e. DEN ATCT personnel shall describe the location of the emergency by reference to taxiways, runways or other prominent landmarks.

EXAMPLE: "Crash site located 1 mile south of the approach end of RWY 35L."

f. After emergency equipment notification, the ATCT shall notify only:

(1) The on-duty Airport Operations Manager (OPS 7). It is the responsibility of the airport management to notify other agencies/personnel as required.

(2) The local aircraft operator or their representative.

g. DEN ATCT shall advise the Airport Operations Manager (OPS 7) of the following:

(1) When the emergency aircraft is next to land.

(2) Any pertinent information as it becomes available.

- (3) When the Pilot-in-Command reports no further assistance is needed.

7. ALERT NOTIFICATION PROCEDURES:

a. DEN ATCT shall alert the emergency equipment by actuating the emergency crash net or, if inoperative, via FM radio through Airport Operations Manager (OPS 7). On initial notification DEN ATCT shall provide all available information. At a minimum, the following will be provided:

- (1) Alert level (Red or Amber).
- (2) Location.
- (3) Aircraft call sign.

EXAMPLE: "Respond to a Red Alert, Runway 8 for American 1180."

b. If the following information is not available on initial notification, it shall be provided to Airport Operations Manager (OPS 7) as soon as practical by DEN ATCT:

- (1) Aircraft company and type.
- (2) Nature of emergency.
- (3) Estimated time of arrival, if appropriate.
- (4) Number of persons on board.
- (5) Amount of fuel on board.

8. RESPONSE PROCEDURES:

a. Only one ARFF vehicle shall be designated as Red Lead. All other vehicles shall use the call sign "RED" followed by the vehicle number.

b. In the event of multiple emergencies, the Airport Operations Manager (OPS 7) shall designate additional Incident Commanders for subsequent responses.

c. ARFF vehicles, when responding to any "Amber/Red Alert" from an ARFF station, are authorized to enter the movement areas at the locations specified below in Table 1 and proceed to the incident location or most appropriate set-up positions. All ARFF vehicles will give way to aircraft unless otherwise instructed by DEN ATCT.

TABLE 1.

STATION	GC FREQ:	MOVEMENT AREA ENTRANCE:
1	West side: 127.50 East side: 121.85	West side: TWY G from the west driveway. East side: TWY AA at TXY L.
2	West side: 127.50 East side: 121.85	West side: TWY Z at UAL Hanger. East side: North end TWY M from VSR.
3	121.85	TWY EC from the south driveway.
4	127.50	TWY WC from the south driveway.