NATIONAL TRANSPORTATION SAFETY BOARD

Office of Aviation Safety
Washington, D.C. 20594

April 12, 2016

AIR TRAFFIC CONTROL FACTUAL REPORT

CEN16MA036

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A. AIRPLANE ACCIDENT

Location: Akron, Ohio
Date/Time: Tuesday, November 10, 2015, 1452 eastern standard time (EST)
Tuesday, November 10, 2015, 1952 coordinated universal time (UTC)
Airplane: Execuflight flight 1526 (EFT1526), a British Aerospace HS 125-700A

B. AIR TRAFFIC CONTROL GROUP

Ms. Betty Koschig
National Transportation Safety Board
Washington, DC

Mr. Timothy Keck
National Air Traffic Controllers Association
Cleveland, OH

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Federal Aviation Administration
Washington, DC

C. SUMMARY

On November 10, 2015, about 1452 eastern standard time (EST), Execuflight flight 1526, a British Aerospace HS 125-700A, N237WR, departed controlled flight while on approach to landing at Akron Fulton International Airport (AKR) and impacted a 4-plex apartment building in Akron, Ohio. The pilot, copilot, and seven passengers died; no ground injuries were reported. The airplane was destroyed by the crash and a post-crash fire. The airplane was registered to Rais Group International NC LLC and operated by Execuflight under the provisions of 14 *Code of Federal Regulations* (CFR) Part 135 as an on-demand charter flight. Instrument meteorological conditions prevailed, and an instrument flight rules flight plan was filed. The flight departed from Dayton-Wright Brothers Airport (MGY), Dayton, Ohio, about 1413 EST and was destined for AKR.

D. DETAILS OF THE INVESTIGATION

On Monday, November 16, 2015, the air traffic control (ATC) group convened at the Akron-Canton Regional Airport (CAK) airport traffic control tower (ATCT), Akron, OH. This facility was a combined ATCT and terminal radar approach control (TRACON) facility. The group conducted an in brief with Mr. David Zakaski, CAK air traffic manager (ATM); Mr. Omoro Lewis, National Air Traffic Controllers Association (NATCA) representative, Ms. DonnRae Rose, support specialist; Ms. Erina Hammond, NATCA Labor Relations; Mr. Jeff Hitchings, FAA Central Service Area quality control group; and Mr. Larry Johnson, FAA event investigations manager.

Facility management provided the ATC group a brief summary of the accident and a tour of the facility. The group reviewed controller records and all associated data related to the incident, and then conducted an interview with the previously assigned arrival west radar (ARW) controller.

On Tuesday, November 17, 2015, the group reconvened at CAK ATCT and conducted interviews with the controller in charge (CIC) and the ARW controller assigned the position at the time of the accident, and then completed the field notes.

1.0 History of Flight

The flight departed Dayton-Wright Brothers Airport (MGY), Dayton, Ohio, about 1413 EST, destined for Akron Fulton airport (AKR). The portions of the flight conducted through Port Columbus ATCT, Columbus approach control, Indianapolis air route traffic control center (ARTCC), and Cleveland ARTCC (ZOB) were routine and uneventful.

About 1432, the ZOB radar sector controller issued the pilot of EFT1526 the CAK altimeter setting of 29.95. About five minutes later the controller switched the pilot to CAK's approach control frequency.

At 1437:59, the pilot of EFT1526 contacted Akron approach reporting, "and Akron approach ahh good afternoon zipline[1] fifteen twenty one (1521) we are ahh nine thousand (9,000) [feet] over HUUVR[2]." The approach controller responded, "I'm sorry, was that zipline fifteen twenty six (1526) calling?" The pilot replied, "That's affirmative sir, over HUUVR nine thousand (9,000) feet and we are inbound at this time." Figure 1 is a radar graphic that illustrates the location of the flight when the pilot checked in on the approach control frequency, and the complete flight path of EFT1526 while in CAK's airspace.

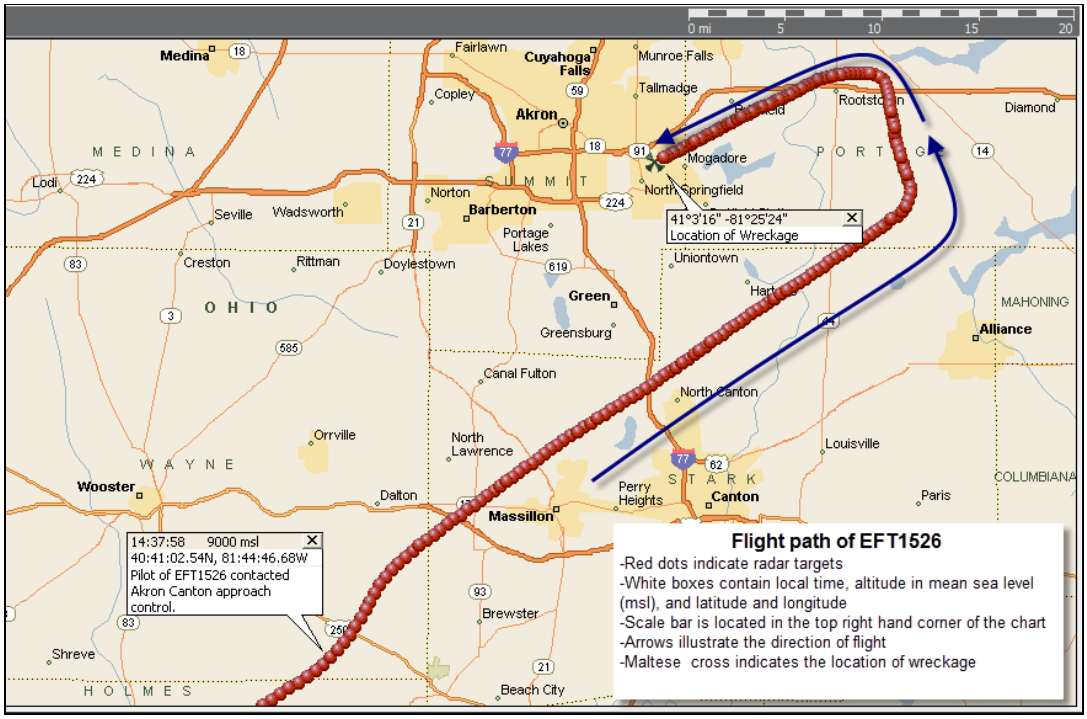

Figure 1. Radar graphic of EFT1526's flight path after checking in with CAK approach.

[1] "Zipline" is the telephony designator assigned to Execuflight aircraft. The call sign, together with a flight number, is the aircraft identification for radio voice communications with air traffic personnel.
[2] HUUVR is a fix located approximately 20 miles southwest of AKR.

At 1438:19, the approach controller instructed the pilot to, "…fly heading zero six five (065), vector localizer two five (25) final approach course Akron Fulton, advise when you have their weather," Seven seconds later the pilot responded, "We are in the process of copying the weather, maintaining 9,000[feet]." At 1438:33, the approach controller instructed the pilot to, "descend at pilot's discretion, maintain 5,000 [feet]." The pilot read back the descent instructions.

Figure 2 is the approach chart for the localizer runway 25 approach at AKR. It illustrates the approach requirements and profile for the approach.

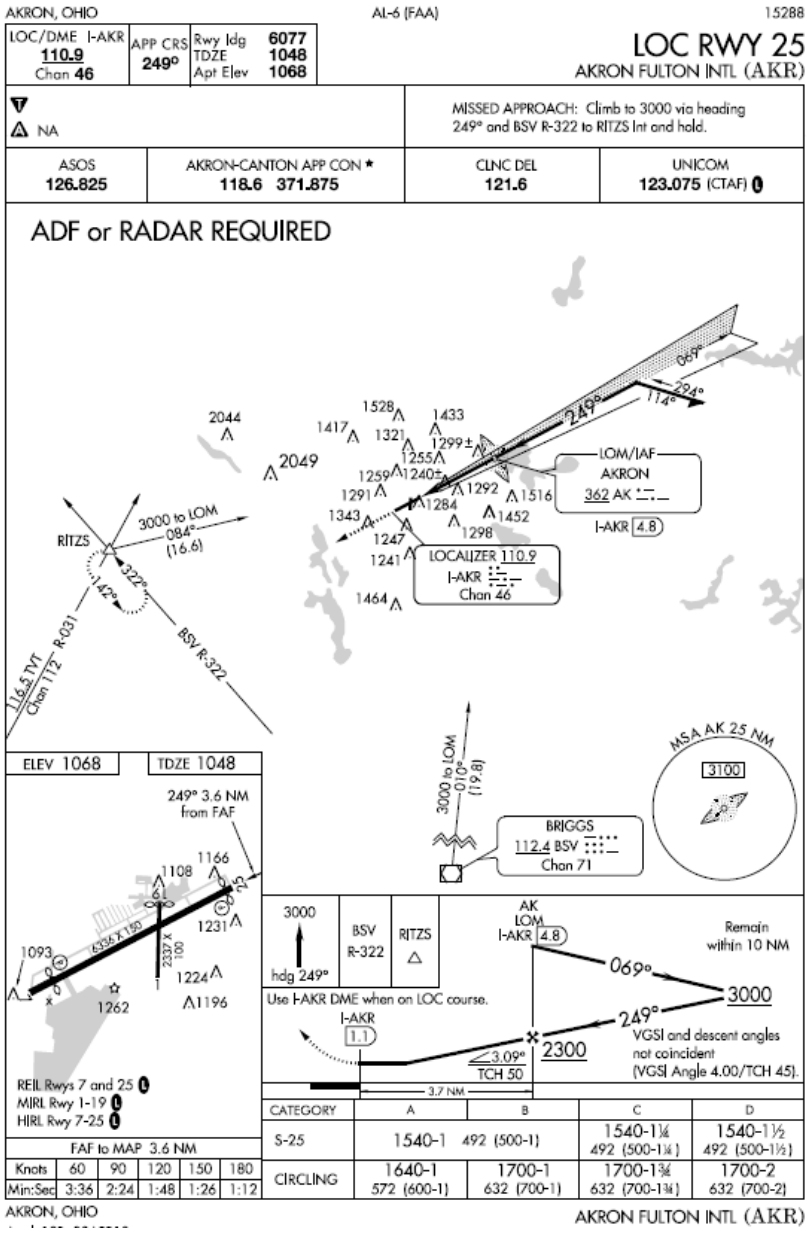

Figure 2. Approach chart for the localizer runway 25 approach at AKR.

About 1441, the ARW controller was relieved for a break. According to the relieving and relief ARW controllers, the position relief-briefing checklist was completed as required. The relieved controller informed the relieving controller, "Zipline 1526 is at 5 [5,000 feet], he's on a 065 heading, vectors for the localizer 25 at Akron Fulton, he told me he was getting the weather but he didn't tell me had it."

At 1444:01, the approach controller instructed the pilot of EFT1526 to reduce speed to 200 knots, then descend and maintain 4,000 feet. The pilot read back the instructions.

At 1445:25, the approach controller instructed the pilot of EFT1526 to turn left heading 350 degrees. The pilot read back the instructions.

At 1446:06, the approach controller informed the pilot of EFT1526, "…[I]do have another aircraft that's inbound to the airport that's ahh slower than you, fly heading ahh three six ahh zero (360) and reduce speed to one seven zero (170)[knots], then descend and maintain three thousand (3,000) [feet].The pilot read back the instructions. Figure 3 is a radar graphic that illustrates EFT1526's flight path turning from base leg to final approach to intercept the localizer for runway 25.

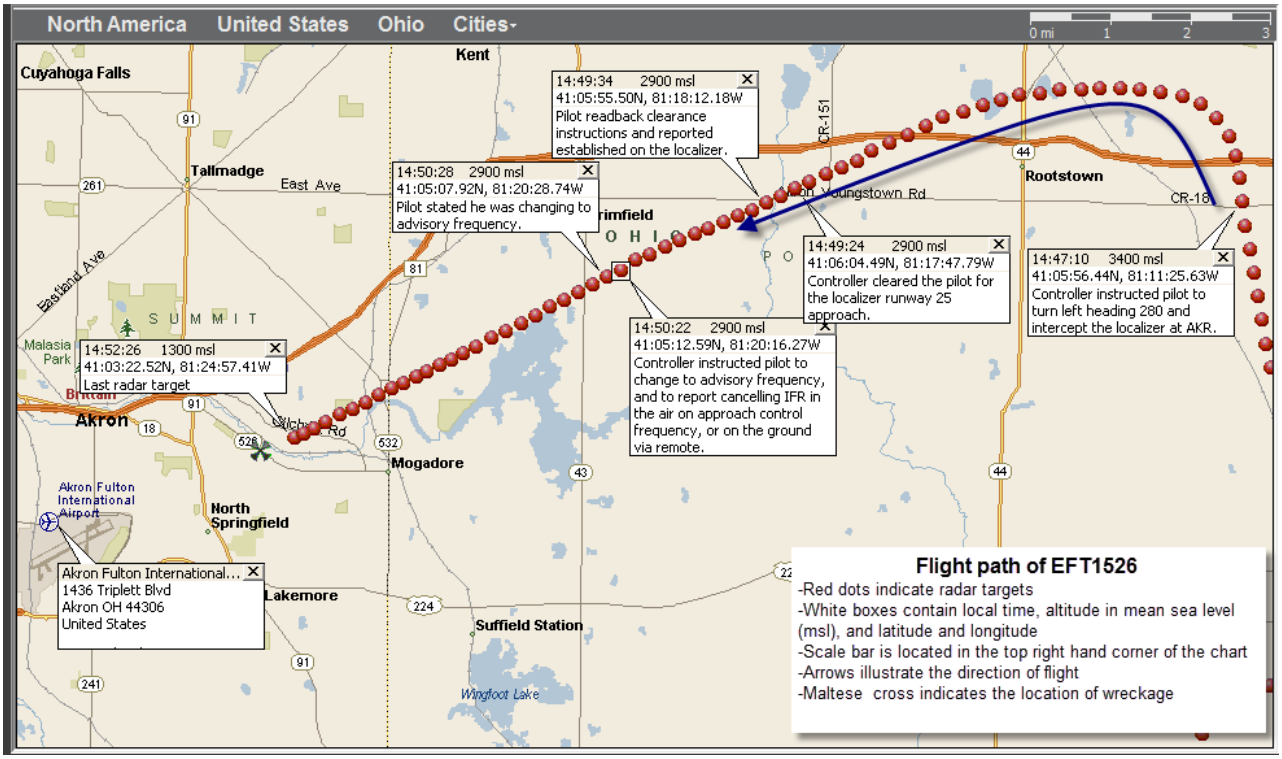

Figure 3. Radar graphic illustrates EFT1526's flight path after turning to intercept the localizer.

At 1447:10, the approach controller instructed the pilot of EFT1526 to turn left heading 280 and intercept the localizer at Akron Fulton airport. The pilot read back the instructions.

At 1448:18, the approach controller instructed the pilot of EFT1526, "…just continue inbound on the approach, traffic half east of the field still has ahh still has not cancelled but ahh I expect no delay." At 1448:28, the pilot responded, "okay we'll continue the approach and standing by for the clearance…."

At 1449:24, the approach controller advised the pilot, "… got the cancellation here and ahh you're four (4) miles the ahh outer compass locator maintain three thousand (3,000) [feet] until established on the localizer, cleared localizer two five (25) approach Akron Fulton airport." At 1449:34, the pilot responded, "clear to localizer two five (25) at Akron, ahh zipline one five three six (1536) we're established on the localizer now."

At 1450:22, the approach controller instructed the pilot, "…change to advisory frequency[3] approved report cancelling IFR in the air on this frequency, or on the ground via remote." At 1450:30, the pilot of EFT1526 replied, "we'll be changing over to ehh oh advisory frequency zipline fifteen twenty six."

At 1459:15, the approach controller attempted to contact EFT1526. The pilot did not respond.

2.0 **Radar Data**

Radar data for this report was obtained from the CAK ASR-11 sensor.

3.0 **Weather Information**

The AKR airport had a federally owned and operated automated surface observation system (ASOS)[4]. The last observation before the accident was:

AKR special weather observation at 1431 EST, automated, wind from 250 degrees at 8 knots, visibility one and one-half statute miles in mist, ceiling overcast at 500 feet, temperature 11 degrees Celsius (C), dew point 9 degrees C, altimeter 29.95 inches of mercury (Hg). Remarks: automated observation system, ceiling 300 feet variable 900 feet agl, temperature 11.1 degree C, dew point 9.4 degree C.

The observation taken two minutes after the accident was:

AKR weather observation at 1454 EST, automated, wind from 240 degrees at 7 knots, visibility one and one-half statute mile in mist, ceiling broken at 400 feet agl, overcast at 900 feet, temperature 11 degrees C, dew point 9 degrees C, altimeter 29.95 inches of Hg. Remarks: automated observation system, sea level pressure 1014.2-hPa, temperature 10.6 degrees C, dew point 9.4 degrees C.

[3] Airports without operating control towers have a Common Traffic Advisory Frequency (CTAF) for communication between aircraft operating there.
[4] The ASOS units are operated and controlled cooperatively in the United States by the NWS, FAA, and DOD.

4.0 ATC Procedures

4.1 Approach Information

En route and terminal approach controllers are required to provide approach information to pilots. The requirements are contained in FAA order 7110.65, *Air Traffic Control*, paragraph 4−7−10 (a), "Approach Information":

> a. Both en route and terminal approach control sectors must provide current approach information to aircraft destined to airports for which they provide approach control services. This information must be provided on initial contact or as soon as possible thereafter…. For pilots destined to an airport without ATIS, items 3−5 below may be omitted after the pilot advises receipt of the automated weather; otherwise, issue approach information by including the following:
>
> 1. Approach clearance or type approach to be expected if two or more approaches are published and the clearance limit does not indicate which will be used.
> 2. Runway if different from that to which the instrument approach is made.
> 3. Surface wind.
> 4. Ceiling and visibility if the reported ceiling at the airport of intended landing is below 1,000 feet or below the highest circling minimum, whichever is greater, or the visibility is less than 3 miles.
> 5. Altimeter setting for the airport of intended landing.

4.2 Transfer of Control Responsibility Procedures

The Akron-Canton Tower/TRACON Standard Operating Procedures (SOP), paragraph 1-7, (a) (1) (2), describes the transfer of control procedures to be conducted during a position relief. The SOP states in part:

> 1. The relieving controller will, after reviewing the status board, weather information and any other duty familiarization information, plug in, activate the brief button on the enhanced terminal voice switch (ETVS)[5] panel, and state their initials. They will then observe the position for a minimum of two (2) minutes before getting a relief briefing.
>
> 3. The controller being relieved will observe the position for a minimum of two (2) minutes and remain plugged in, after which they will state their initials and then deactivate the brief button on the ETVS panel.

5.0 Personnel Interviews

5.1 Arrival West Radar (ARW) Controller (previously assigned)

Mr. Terry Lee Parris began working for the FAA in July 1984, at the FAA Academy. Before transferring to CAK in 1992, he worked at the University of Illinois-Willard airport (CMI), Champaign/Urbana, IL, from November 1984 to January 1991, and CLE from January 1991 to April 1992. He stated that his medical certificate was current with a requirement to have

[5]The ETVS is a non-blocking, fully integrated, digital voice communications system.

eyeglasses in his possession. He stated he was in compliance that requirement at the time of the accident.

On Tuesday, November 10, 2015, Mr. Parris did not work his regularly scheduled shift of 1400 to 2200. He swapped shifts with another controller that week and worked from 0700 to 1500 the day of the accident. Mr. Parris had been working the ARW position when EFT1526 checked in with CAK approach control. The normal position relief was conducted, and Mr. Parris was relieved by Mr. McKenzie.

Mr. Parris recalled that EFT1526 entered the airspace level at 9,000 feet over HUUVR. He told the pilot to expect the localizer approach to runway 25 at AKR, and asked the pilot if he had the ASOS information for AKR. The pilot responded that he was in the process of getting the weather. Mr. Parris instructed EFT1526 to descend at pilot's discretion to 5,000 feet, and fly a 065 heading. About three minutes later, Mr. McKenzie came in to relieve him from the position.

Mr. Parris said they went straight down the checklist during the position relief briefing. He recalled telling Mr. McKenzie that EFT1526 was in the process of getting the weather, but he did not have it yet. He then continued with the position relief briefing, which provided Mr. McKenzie other pertinent information for the position. Mr. Parris then pushed back from the position, and two minutes later announced his initials over the ETVS. (Section 5.2 of this document describes the SOP for position relief.) Mr. Parris then left the control room and went to the break room. He was in the break room for about 8 minutes before he went home. He found out about the accident as soon as he arrived at home.

When asked if he thought the weather was sufficient for EFT1526 to conduct an approach into AKR, Mr. Parris stated that he felt the approach to AKR was feasible at that time because the preceding aircraft into AKR (N4291S, a P28A), landed and cancelled. He did not receive a pilot report (PIREP) from the pilot of N4291S. He was told that the P28A pilot provided a PIREP over the airport's common traffic advisory frequency, and that EFT1526 acknowledged that PIREP.

When asked what methods pilots used to ensure their IFR flight plan was cancelled after landing at a satellite airport, Mr. Parris stated that pilots landing at AKR normally use the remote frequency to call the TRACON to report canceling IFR.

Mr. Parris did not notice anything odd about EFT1526's flight. However, normally when a pilot is asked if they have the weather, the pilot would state that they "do or do not" have the weather, so it was unusual that the pilot stated he was "getting the weather." Mr. Parris did not recall if there was any precipitation depicted on his radar display at that time.

When asked why he did not provide EFT1526 the altimeter setting for AKR when the flight checked in, Mr. Parris explained that in order to get the current altimeter for AKR, he would need to get the current ASOS information. They do not have a direct line to get that information; they have to dial a phone number to get it. Mr. Parris added that they do not have an information display systems (IDS)[6], which would provide access to satellite airport weather information.

[6] IDS is an electronic tool that provides a single point of access to static data, such as documents, lists and maps, and to dynamic data such as weather display systems or automated tools.

When asked about controller access to current weather information for satellite airports, Mr. Parris said that they do not have any capability to get the current ASOS weather except by calling the published ASOS telephone number. They can pull up some airports' ASOS weather information, but that is not always the current information, because only the last hourly weather observation will be printed out. CAK controllers do not get weather briefings, but Mr. Parris always looked at the weather reports in the Comprehensive Electronic Data Analysis and Reporting (CEDAR)[7] system before signing on position.

At 1418, a pilot landing at CAK provided a pilot report of weather conditions. When asked why he did not provide that PIREP to the pilot of EFT1526, Mr. Parris replied that the PIREP pertained to an arrival into CAK, not AKR. The weather at CAK may not be the same weather as AKR, so that PIREP was not applicable to EFT1526.

Mr. Parris was asked if he normally solicited PIREPs in accordance with the FAA Order 7110.65.[8] He said he was aware of the instruction, but did not solicit PIREPs that session because there were already some valid PIREPs available when he signed on position.

When asked if there were any significant meteorological information (SIGMETs) or airmen's meteorological information (AIRMETs) [9] valid at that time, Mr. Parris said that he believed they had an AIRMET at that time, and explained that AIRMETs are broadcasted through the hazardous inflight weather advisory service (HIWAS) and by flight service stations.

When asked about CAK's PIREP handling procedures, Mr. Parris said that when a PIREP was received, the controller decided what to do with it. If it needed to be disseminated, the information would be passed to the flight data (FD) controller to be sent out, or FD would call flight service with the information. PIREPS that were no longer applicable were tossed in the trash can. When asked how they disseminated PIREPs within the facility, Mr. Parris stated that the tower passed PIREPs to the TRACON via the drop tube, and the TRACON passed PIREPs to the tower via the ETVS.

When asked if staffing levels were normal for that session, Mr. Parris stated that they usually have a stand-alone data controller, radar controller, and CIC. At the time of the accident, all of the supervisors had some sort of meeting going on in one of the offices, so there was not a supervisor in the room at that time. The traffic level at that time was not significant enough to split the approach control position into two positions. They normally split the positions when there was a high volume of traffic or when weather conditions were deteriorating.

6.1 Controller in Charge (CIC)

Mr. Mark Edward Gordon began working for the FAA on November 22, 1985, at the FAA Academy in Oklahoma City. Before transferring to CAK in 1992, he worked at Terre Haute,

[7] CEDAR is an electronic tool that provides a standard interface for collecting, retrieving, and reporting data from multiple sources.

[8] FAA Order 7110.65, Air Traffic Control, paragraph 2-6-3 (a) PIREP Information. a. Solicit PIREPs when requested or when one of the following conditions exists or is forecast for your area of jurisdiction: Ceilings at or below 5,000 feet. These PIREPs must include cloud base/top reports when feasible.

[9] SIGMET is a weather advisory issued concerning convective weather significant to the safety of all aircraft. AIRMETs concern weather of less severity than those covered by SIGMETS.

Indiana from 1986 to 1992. His stated his medical clearance was current with a restriction to wear corrective lenses, and that he was in compliance with that restriction at the time of the accident.

On Tuesday, November 10, 2015, Mr. Gordon worked his regularly scheduled shift and was assigned to the combined CIC and arrival data positions. He described the traffic level as light, but with some complexity because of weather.

Mr. Gordon recalled that there were two aircraft vectored for instrument approaches to AKR. The first aircraft landed and cancelled his IFR flight plan, and then EFT1526 was cleared for the localizer runway 25 approach at AKR.

Mr. Gordon took a phone call at the CIC desk from a flight instructor in the airplane that had just landed at AKR before EFT1526. Mr. Gordon asked the caller some questions to verify that he was indeed one of the pilots. The caller then explained that they (he and the student pilot) were at Akron Fulton airport next to the runway. They heard the pilot of EFT1526 check in on the airport traffic advisory frequency and provided the pilot a PIREP for AKR. Then they heard a second transmission on the frequency that, "…sounded eerie and the pilot sounded scared," and they never saw the EFT airplane land. Mr. Gordon obtained the caller's contact information. Before hanging up, the caller stated that his student pilot was an Ohio State Highway Patrol officer and they had just heard a broadcast about a plane crash in their vicinity over his police-issued radio. Mr. Gordon thanked the caller for the information and advised that he might be calling him back.

Mr. Gordon then paged the front line manager (FLM) over the intercom, "Back to the TRACON, NOW." He said the FLM and other supervisors came quickly to the TRACON, and other controllers came with them to help.

Mr. Gordon then directed one controller to relieve Mr. McKenzie from the ARW position, and another to relieve him from the CIC position. The supervisor began completing the accident checklist and notifications after receiving confirmation that the airplane had crashed. Although he had been relieved from the position, Mr. Gordon stayed in the room to help with coordination. Mr. Gordon said that he had not noticed anything odd about EFT1526, except that he did not recall seeing that "Zipline" call sign before. He added that Mr. McKenzie had not made any remarks to him about EFT1526.

Mr. Gordon said he had been on position approximately 15 to 20 minutes before the accident occurred. Staffing was normal for that time of day.

When asked about weather conditions in the area at that time, Mr. Gordon stated there had been a PIREP forwarded to them by CAK tower reporting cloud bases on final at 1500 feet. He added that it was not a common practice to disseminate CAK PIREPs to aircraft landing at satellite airports.

In reference to weather conditions at AKR, Mr. Gordon said that he had no reason to think that EFT1526 could not complete the approach because the Cherokee ahead had landed successfully. Mr. Gordon said that there were no reports of icing in the area.

Mr. Gordon was asked if he was familiar with the criteria for soliciting PIREPs outlined in FAA order 7110.65. He was able to recite the requirements. Mr. Gordon was asked what the PIREP handling procedures were for CAK. He explained that he usually wrote PIREPs down on a pad of paper or a flight strip. Traffic permitting, he would then transfer that information to a PIREP form and pass the form to flight data controller for dissemination The form was then placed in the daily paperwork for retention.

The TRACON received weather reports and significant PIREPs for CAK via the ASOS panel above the radarscopes. There was no formal weather briefing available to the controllers. The facility has contract weather observers but there was no routine communication with them. Mr. Gordon stated that he did not know what the current weather was at the ASOS/AWOS[10] equipped airports in the CAK airspace because the information was not readily accessible. He noted that until a few days before this interview, no one at the facility was aware that weather information could be requested via a weather request (WR) message on the flight data input/output (FDIO) terminal.[11]

Mr. Gordon recalled that EFT1526 appeared to be on the final approach course for the localizer runway 25 approach into AKR. He stated that he did not see too many pilots “dive and drive” (meaning descend to the minimum descent altitude on a non-precision approach), for that approach at AKR.

7.1 Arrival West Radar (ARW) Controller

Mr. Douglas McKenzie began working for the FAA in May 1987 at the FAA Academy. Before transferring to CAK in December 1991, he worked at Ohio State University airport, Columbus, Ohio, from 1987 to 1991. He stated that his medical certificate was current with a requirement to wear eyeglasses, and that he was in compliance with that requirement at the time of the accident.

On Tuesday, November 10, 2015, Mr. McKenzie worked his regularly scheduled shift and was signed on the ARW position at the time of the accident. Mr. McKenzie relieved Mr. Parris from the ARW position.

Mr. McKenzie stated that he monitored the position as Mr. Parris commenced the position relief-briefing checklist. When the position relief briefing was completed, he signed on the position.

Mr. McKenzie recalled that EFT1526 was south of CAK, on a 065 heading, at 5,000 feet, and being vectored for the localizer runway 25 approach to AKR. He also had a Cherokee, N4291S, preceding EFT1526 inbound to AKR. He kept EFT1526 on a 065 heading, but issued the pilot a speed restriction and descent to 4,000 feet.

Mr. McKenzie then turned EFT1526 to a 350 heading for a modified base leg, and the Cherokee proceeding EFT1526 on a heading to intercept the localizer at AKR.

[10] Automated weather observing system (AWOS) units mostly operated, maintained, and controlled by the FAA.
[11] The FDIO system distributes flight plan data, weather information, and general information.

Mr. McKenzie continued to watch the speed and heading of EFT1526, and thought to himself that that it may be "a bit tight." He explained that they have a remote communications site at AKR, and when the weather dictated, it was routine for pilots to report cancelling their IFR flight plans after landing at AKR. So taking the weather into consideration and the time it would take the pilot to report canceling, Mr. McKenzie decided to build in more spacing. He gave EFT1526 another speed restriction and turned the airplane to a 360 heading.

Mr. McKenzie recalled that when EFT1526 was in the vicinity of Akron VOR (ACO), he gave the pilot a 280 heading to intercept the localizer. He then cleared the Cherokee for the approach, advised the pilot about the succeeding jet traffic inbound to AKR, instructed him to report canceling as soon as possible, and then switched the pilot to the advisory frequency.

Mr. McKenzie listened for the Cherokee pilot to report cancelling on the remote communications site. The speaker for that frequency was located behind him at the flight data position. He routinely instructed pilots to report canceling, and always listened up for that call. When he heard the Cherokee pilot report canceling, Mr. McKenzie informed the pilot of EFT1526 that his airplane was four miles from the outer compass locator (LOM) and issued the approach clearance. When the pilot reported established on the localizer, Mr. McKenzie switched EFT1526 to the common traffic advisory frequency. The flight was at 3,000 feet and nothing seemed different from any other traffic.

Mr. McKenzie recalled that after he switched EFT1526 to advisory frequency, he began watching the aircraft track inbound. About that time, a Centurion departed CAK for a practice instrument approach. After radar identifying and tending to that Centurion, he continued to listen for the pilot of EFT1526 to report canceling. Mr. McKenzie explained that his normal routine was to put aircraft that were inbound to satellite airports into the "M" handoff position status, which would prevent the data tag from dropping off. He noted that everything seemed to be normal with the flight.

Mr. McKenzie was listening up for EFT1526's cancellation report when he heard the phone ring. Mr. Gordon answered. He only heard parts of the conversation between Mr. Gordon and the caller. Mr. McKenzie immediately keyed up his frequency to contact EFT1526, but the pilot did not respond.

Mr. McKenzie said he had asked Mr. Gordon who was on the phone, and heard Mr. Gordon trying to validate who the caller was. Mr. McKenzie said he had a feeling that whomever it was calling on the phone was saying that EFT1526 had never made it to the airport.

He said that Mr. Gordon then called the supervisors, via the intercom, to come to the radar room. All of supervisors and some controllers came up and started going down the list and making notifications. He did not recall when he was relieved from the position, but it was a short time afterward. After being relieved, he went to the supervisor's desk to see what he could do to help.

When asked if the pilot of EFT1526 had the weather information for AKR, Mr. McKenzie said that Mr. Parris had told him that EFT1526 was in the process of getting the weather, but the pilot did not report that he had it.

Mr. McKenzie stated that in his mind the pilot had the weather information. When the pilot stated that he was in the process of getting it, it was his belief that the pilot of EFT1526 had received the weather information for AKR.

Mr. McKenzie was aware that the cloud base report at AKR was at 1,500 feet, but he did not know the tops report. Mr. McKenzie said it was not a common practice to provide a PIREP received at CAK to a pilot landing at AKR. He noted that although he had never made a comparison of the altimeter differences between CAK and AKR, he did not like to mislead pilots by giving them the CAK altimeter.

Mr. McKenzie was asked if the alignment of EFT1526 on final approach looked normal. He explained that flights into AKR were often displayed slightly left of the localizer course when they were actually on it. That is the reason he re-cleared the pilot to maintain 3,000 until established on localizer.

Mr. McKenzie was asked if he could think of anything he could have done differently to change the outcome of this flight. He said that if nothing had happened with this flight, he would have said that that there was nothing he would do differently. However, since something did happen, he will always think about what he could have done differently.

Betty Koschig
AS-30