

Ms. Heidi Kemner
Air Safety Investigator
National Transportation Safety Board
45065 Bles Park Drive
Ashburn VA. 20147

RE: ERA17FA190



March 8, 2019


Dear Ms. Kemner,

We appreciate the opportunity to respond to the draft factual report. Please accept the attached as Metro Aviation's submission on ERA17FA190.

If you have further questions or need anything else please let us know.

Kind Regards,



Ed Stockhausen
Director of Safety
Metro Aviation Inc.


Shreveport LA. 71107

Cc: file

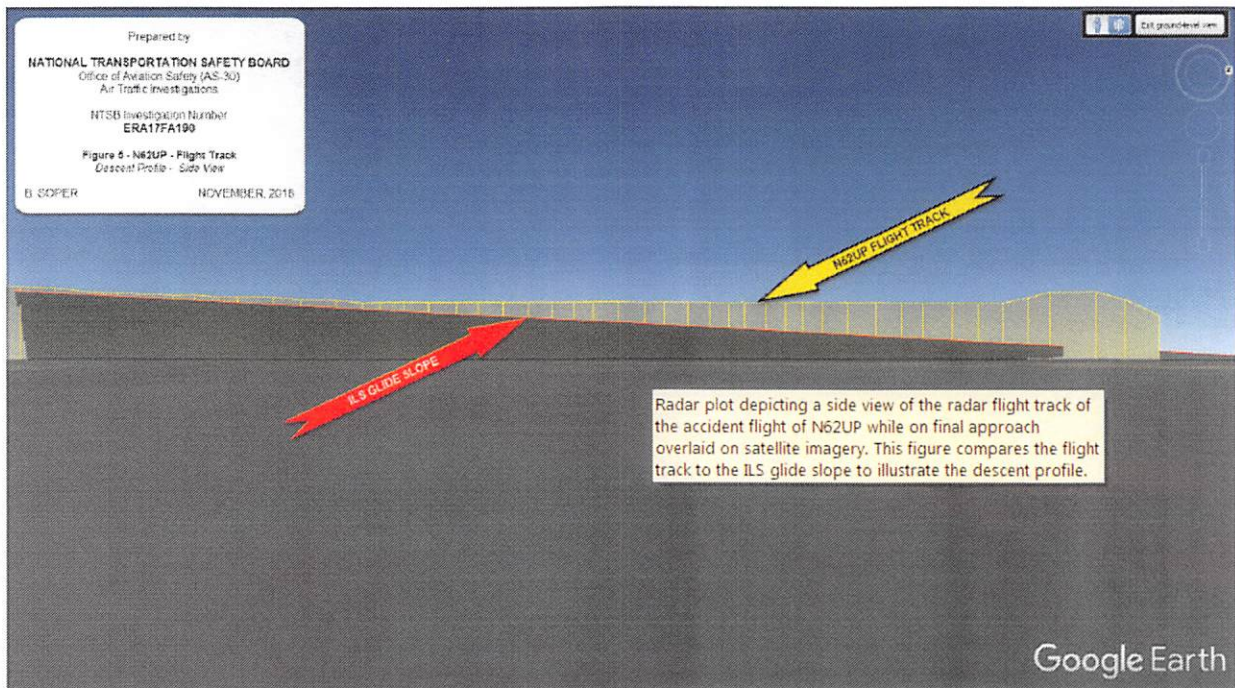


Figure 5 - Radar flight track of the final segment of the accident flight of N62UP. This is a side view of the final segment, with the ILS glideslope depicted in order to illustrate the descent profile of N62UP while on final approach.

Additional information

While some additional information may be helpful. This section of the report represents information that is leading to a suggested causal factor not supported by any identified facts. Metro Aviation would prefer that if included as part of the investigation it be removed from the “factual report” and placed in the docket as a separate exhibit for reference.

Nothing follows>

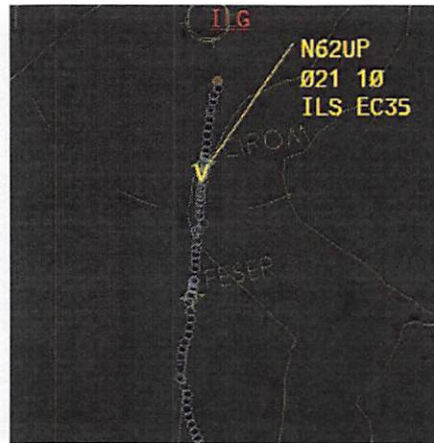
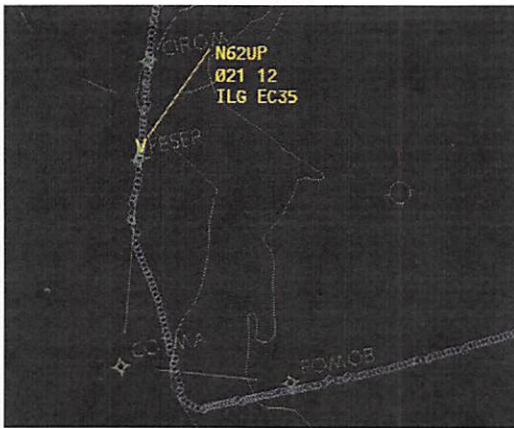
- At 1552:50 ILG LC...“November six two uniform papa roger fly the missed approach I’m gonna contact Philly they’ll have to bring you back around”

There was no further contact with N62UP and radar contact with the aircraft was lost

History of Flight/ATC

PHL

Statements from the ATC controllers on duty at the time of the accident indicated a moderate work load and traffic complexity based on a scale of 1 being light and 5 being heavy. The PHL SD controller at the time of the accident was the SD combined with two additional positions, DuPont and South High respectively. The handoff to the ILG LC was considered routine by the PHL SD. The FALCON displays N62UP crossing Hadin and intercepting the course but not descending when intercepting the glideslope. No additional attempts were made to contact N62UP until radar contact had been lost.



ILG

Statements from the ATC controllers on duty at the time of the accident indicated a light work load and traffic complexity based on a scale of 1 being light and 5 being heavy. Just previous to the accident the LC was participating in a position relief briefing (PRB). The FLM was acting as the LC and was being relieved. The oncoming LC had been working as the GC, FD, CD and CIC. During the transfer both the FLM and the oncoming LC were distracted by a computer glitch that was not allowing the oncoming LC to sign in. During that time N62UP made initial contact with Wilmington tower. The oncoming LC picked up the headset and responded with a clearance to land. The PRB was then completed. Due to the computer distraction and the PRB, no further attempts were made to contact N62UP until radar contact was lost.

Both the PHL and ILG ATC facilities failed to notice or react to N62UP not descending on glide slope after passing the final approach fix on course. Controllers at both facilities stated they would ordinarily provide advisories to both course and azimuth to aircraft inside the final approach fix.

Communication

ATC Transcript sections from...PHL SD

- At 1548:26... The SD instructed N62UP to “descend and maintain two thousand and turn ten degrees left”.
- At 1548:31 N62UP... replied “ten degrees left down to two thousand six uniform pop”.
- At 1549:5...3 SD “two uniform pop, two from Hadin ah maintain at or above two thousand to established cleared ILS runway one approach”
- At 1550:01 N62UP... responds “alright two miles from Hadin maintain at or above two thousand six two uniform pop

Prior to this read back instruction, all of the read back from N62UP had been correct. The transcript for the SD indicates the SD used the words “to established” not “until established” and the read back from N62UP did not include either phrasing or terminology. (Report line items 201 through 207) N62UP did not descend after crossing the FAF and intercepting the localizer.

ATC Transcript partial sections from...ILG LC

- At 1550:48 N62UP... called “Wilmington tower helicopter six two uniform papa just crossing Hadin two thousand”.
- At 1550:54 ILG ...responded “helicopter six two uniform papa Wilmington tower roger runway one wind zero six zero at seven cleared to land
- At 1550:58 an Station Relief Briefing SRB is being completed and the LC is recorded as saying to her relief “you get that, you know everything that’s going, that’s your first traffic, six two uniform papa”
- At 1551:03 N62UP... responds to the LC clearance with “six two uniform pop” but doesn’t acknowledge or read back the clearance to land
- At 1552:18 N62UP...”and Wilmington tower November six two uniform Papa”
- AT 1552:19 ILG LC...” November six two uniform Papa Wilmington tower”
- At 1552:23 N62UP...yeah we’d like to go around and start the missed approach if able come back around”
- At 1552:28 ILG LC...”November six two uniform papa roger did you communicate that too philly did they know you wanted to do a missed approach”
- At 1552:34 N62UP...”uh we didn’t want too ma’am”
- At 1552:36 ILG LC...”roger are you having a hard time getting the field in sight”
- At 1552:40 N62UP...”yeah we got some ah bad vectors at the very end there we went back and forth and I was wondering if I could just line up and come back around again”

Addendum for ERA17FA190

Personnel Information

The pilot was hired in June of 2013. The pilot's pre hire records indicated 100 hours of instrument flight in a combination of both fixed and rotor wing aircraft. According to Company flight logs, from the date of hire until the accident date the pilot had logged 785.8 hours most of which were in the accident aircraft. Of that time, 15.5 hours were in IMC, 23.5 hours were under the hood and 20.0 hours were in level D simulators matching the aircraft make and model.

Meteorological Information

ATC guidelines for PIREP solicitations and dissemination FAA order JO 7110.65W, Air Traffic Control, Chapter 2, Section 2, Paragraph 2-6-3 states in part:

- a. Solicit PIREPS when requested or when one of the following condition exists or is forecast for your area of jurisdiction
 1. Ceilings below 5000 feet. Reports should include cloud base/top
 2. Visibility (surface or aloft) at or less than 5 miles
 3. Thunder storms and related phenomena
 4. Turbulence of moderate degree or greater
 5. Icing of light degree or greater
 6. Wind shear
 7. Volcanic ash

All of the highlighted conditions existed according to the available METAR/TAF at the time of the accident with the exception of wind shear. The probability (90%) of moderate and greater turbulence and wind shear between 970 and 4500 feet was indicated by the High Resolution Rapid Refresh numerical model wind profile due to a frontal inversion.

d. Handle PIREPS as follows:

1. Relay pertinent PIREP information to concerned aircraft in a timely manor
2. *EN ROUTE* Relay all operationally significant PIREPS to the facility weather coordinator
3. *TERMINAL* Relay all operationally significant PIREPS to:
 - (a) The appropriate intra-facility positions
 - (b) The FSS serving the area in which the report was obtained
 - (c) Other concerned terminal of enroute ATC facilities