

December 8, 2009

Mr. Mark George  
Office of Aviation Safety  
National Transportation Safety Board  
490 L'Enfant Plaza, S.W.  
Washington, DC 20594

Re: Accident DCA08MA098

Dear Mr. George:

Thank you for the opportunity to offer these final comments regarding the tragic aircraft accident that occurred here on September 19, 2008. I will confine my comments to two issues surrounding the accident; the prohibition of 180-degree turns on paved surfaces and the reference to several small 'chips' found on the runway during the course of the investigation.

In October, 1984, the Columbia Metropolitan Airport (CAE) sent a letter to the manager of the Columbia Air Traffic Control asking tower personnel to prohibit 180-degree turns on our runways for aircraft weighing in excess of 12,500 pounds. The intent of this restriction is to protect runway surfaces from excessive wear due to the shear forces exerted by aircraft tires in a tight turn and to preclude damage to runway edge lights, signs and the unpaved areas adjacent to the runways. This restriction was subsequently published in the Federal Aviation Administration's (FAA) Master Record (FAA Form 5010) for our Airport and in the FAA's Airport/Facility Directory (A/FD).

The transcript of the Cockpit Voice Recorder clearly indicates that the FAA authorized a 180-degree turn to the crew of the accident aircraft. The turn may not have been a factor in the accident, but we were dismayed that the FAA authorized it. Furthermore, we were later given the impression that the FAA does not require its controllers to periodically review the A/FD in order to maintain awareness of local restrictions or hazards. We believe the information published by the Airport in the A/FD is essential to flight safety and should be reviewed by controllers at least annually.

Mr. Mark George  
December 8, 2009  
Page Two

The 180-degree turn restriction began in 1984 and has never been rescinded by the Airport. Again, a comment regarding this restriction is published in the Airport Master Record, FAA Form 5010, and in the A/FD. However, the FAA deleted this restriction from the 5010 and the A/FD on several occasions without the knowledge or concurrence of the Airport. The A/FD is our best opportunity to relay safety-of-flight information to aircrews and air traffic controllers, and the FAA needs to improve the integrity of this document. The restriction was omitted from the current publication of the A/FD but the FAA is unable to explain why, or who deleted the restriction from the document.

The second issue regards reference to several small 'chips' found on the runway during the investigation of the accident. These chips are referenced on pages 5 and 6 of the Airworthiness and Maintenance Chairman's Factual Report. While I do not dispute the existence of these chips, the Tire, Wheel and Brake Documentation with Aircraft Tire Study issued on September 11, 2009 did not cite these chips as relevant to the accident. I believe reference to these chips should be removed from the report. The Tire study cited no puncture damage to the tires but referencing these chips might erroneously lead one to believe they could have.

Thank you, again, for this opportunity to express our views in this manner. The Airport District is extremely grateful to the National Transportation Safety Board for all of the hard work and professionalism demonstrated by its staff.

Sincerely,

Charles M. Henderson, AAE  
Deputy Director