

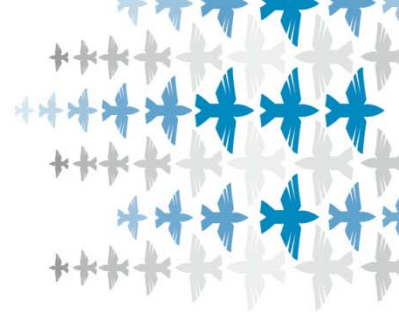
SeaPort Airlines
Juneau, AK
July 17, 2015
ANC15FA049

**NATIONAL TRANSPORTATION SAFETY BOARD
WASHINGTON, D.C.**

ATTACHMENT 23

Draft Letter of Intent from SeaPort

3 Pages



SeaPort Airlines/Wings of Alaska
Peter Baker, Director of Safety & Security
7505 NE Airport Way
Portland, Oregon 97218

The Medallion Foundation
Ms. Deborah Walker, Deputy Director
1520 Post Road
Anchorage, Alaska 99501

May 5, 2015

Dear Ms Walker,

In the interval between our last full Medallion audit and the present, a number of changes at SeaPort Airlines and Wings of Alaska have contributed to necessary revisions in the upkeep of our Medallion shield. There has been turnover of personnel in management as well as front-line employees resulting in key people charged with actively executing the program(s) leaving the company. As a result some practices were neglected. Notwithstanding the preceding, dedication to safety is and has always been SeaPort/Wings number one core value.

SeaPort Airlines is committed to a robust safety system with the Medallion program at its core. To bring our shield back into fully functioning practice, our plan is as follows (and in this order):

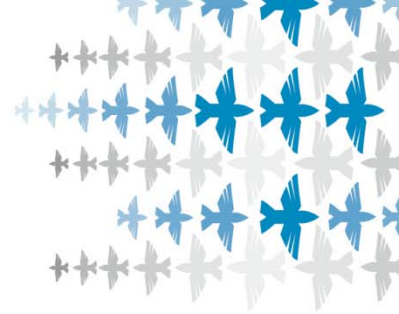
1. Review each of the five STAR manuals individually to re-align each with the Medallion audit points.
2. Using the revised IEP STAR, ensure that practices are occurring and having the desired result; where they are not, revise the practices to achieve the intended outcomes.

As a part of this plan, I will send you each of the revised STAR manuals for your review as I complete them. In addition, I will consult with you regarding the results of my audit using the IEP STAR when it is complete. Following the changes to be implemented (listed below), please note the schedule I'll be working within for each of the aforementioned steps.

In keeping with our discussions of April 21st, I have prepared the following list of changes to our Medallion STAR program manuals to bring them up to date. Please note, this is not an exclusive list, but rather a starting point. Other changes will likely be made in addition to these as we work through the process. The following items represent what we talked about during our meeting of two weeks ago. I will be seeking to use Medallion audit documents and other Medallion guidance to affect the changes that will update our programs and prepare us for audit in October.

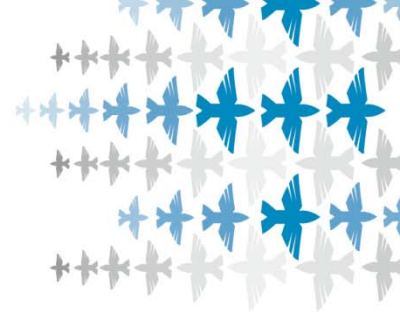
Changes to be implemented:





- A program review will be created for each STAR consisting of:
 - Ensuring personnel list associated with the program is current.
 - Looking at results of any audits completed during the review period including findings and corrective actions taken.
 - Safety reports submitted during the review period and resulting corrective actions taken (if any)
 - Events summary.
 - A discussion to determine if goals are being met.
 - A discussion of new goals if necessary.
- For each STAR manual, the ownership (STAR Manager) of the manual will no longer reflect an employee name, but rather an employee title.
- Whenever training of an employee is required by any STAR manual, references to the actual course will be replaced with “Medallion Training”.
- Forms required by any STAR manual to be filled out at specified intervals (ie Ramp Risk Assessment) will be review and edited to reflect SeaPort Airlines’ current operation.
 - Instructions for such forms will include the requirement to retain completed forms for a minimum of 30 days.
 - Forms designed to document a hazard will also have a space to document any corrective action taken (for instance, if a slippery ramp is documented on the Ramp Risk Assessment form, a space to indicate what action was taken to mitigate the risk associated with that hazard will be provide with a requirement to document any action taken).
- Where employee training is required in any STAR manual, differentiation shall be made between initial and recurrent training.
- In the Maintenance & Ground Service STAR manual, clarification will be made to indicate that JNU is the only station at which SeaPort operates a fuel truck.
 - A fuel truck daily inspection form will be included with instructions regarding how to properly inspect the fuel truck, how to fill out the form, and the duration of completed form retention.
- It shall be noted in all STAR manuals that when Safety Reports are submitted, corrective action taken shall be documented.
- The Internal Evaluation STAR manual will reflect that internal audit shall check for corrective actions taken for all documented hazards (Safety Reports).
- Using Medallion audit points as a guide, language will be drafted for both the GOM and GMM reflecting process and procedure relevant to safety as follows:
 - Required inspections (such as daily vehicle inspections) and accompanying reporting.
 - Hazard identification and reporting.
 - Corrective actions taken with accompanying documentation.
 - Records retention.
- In all STAR manuals an explanation of training (initial and recurrent) documentation and record-keeping will be added specifically addressing
 - How training is to be recorded and by whom.
 - Where training records are to be held.
 - The method of retaining training records (ie paper or electronic or both).





- In the Safety STAR manual, an “After Action Report” shall be added with guidance to use it after any event requiring use of the ERP.
- Within the Safety STAR manual, wherever reference is made to “reviewing the manual”, this reference shall be changed to “reviewing the program”.
- In all STAR manuals, wherever audits are indicated, additional information will be added to indicate the individual (identified by position, not name) who is responsible to perform the audit.
- The Safety STAR manual will contain verbiage that each station is required to conduct a safety meeting at least one each month, and a Station Manager’s safety meeting shall be conducted quarterly.
- Training courseware used to train company employees about safety and the safety program shall be updated to reflect the most current information.
- Promotional materials calling attention to safety reporting, and the incentives for doing so, shall be discussed and acted upon by senior leadership.
- All hardcopy and electronic safety forms shall be reviewed to ensure they are relevant and contain current information (specifically contact phone numbers, web addresses, etc).
- The IEP STAR manual shall make clear that STAR Managers are responsible to audit their respective STAR programs annually, and that the IEP STAR Manager will audit those audits annually as a check on the process.

Schedule of STAR Manual Audit/Revision

STAR Program Manual	Dates For Review	Completion Deadline
Internal Evaluation STAR	5/11/15-5/29/15	5/29/15
Safety STAR	6/1/15-6/19/15	6/19/15
Maintenance & Ground Service STAR	6/22/15-7/10/15	7/10/15
Operational Control STAR	7/13/15-7/31/15	7/31/15
CFIT Avoidance STAR	8/3/15-8/21/15	8/21/15

Please contact me directly if this plan requires editing to meet the goal of being prepared for a successful audit in October.

Sincerely,

Peter Baker
 Director of Safety & Security

CC: Rob McKinney

