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Anchorage, AK 99502

Ms. Noreen Price
Aviation Accident Investigator
National Transportation Safety Board
222 West 7th Ave
Room 216, Box 11
Anchorage, AK 99513

Re: NTSB Factual Investigation into Accident ANC18FA055

Dear Investigator Price,

This letter serves as a formal written submission by Regal Air in response to the NTSB's investigation and interpretation of the facts of the July 18, 2018 accident at Willow Lake, Accident ANC18FA055. We appreciate the amount of work and effort investigators and the NTSB have put into evaluating this accident and flight safety, however, in this particular accident we believe the NTSB's factual conclusions have some inaccuracies and shortcomings.

First, the accident report misrepresents the accident pilot's knowledge and experience flying at Willow Seaplane Base and on Willow Lake. The factual report states that the pilot had not flown out of Willow Lake before and that the DO reviewed the lakes, route, and fuel load with him prior to the flight. While this may have been his first flight out of Willow Lake as a pilot for Regal Air, the accident pilot had extensive experience operating there prior to the accident flight. He performed his floatplane training and obtained his floatplane rating out of Willow Lake before joining Regal Air.

Secondly, in the course of its investigation the NTSB made weight and balance computations in an attempt to determine the weight of the aircraft and its load during the accident flight. The NTSB's final assessment relies on estimations and guesswork as to the weight of multiple pieces of cargo. Many of these estimates were provided by a passenger of the accident flight, a party directly interested in the outcome of the investigation, and without corroborating evidence. These assumptions include unsupported estimates that the passenger's mail weighed 30 pounds, her baggage 20 pounds, that the pilot also brought a 20 pound bag, estimates as to numerous other small personal items, and an estimation as to the fuel levels within the aircraft.

Despite the fact that its weight and computation analysis relies upon numerous unproven assumptions, the NTSB concluded the flight was overweight by 75.8 pounds. The factual report presents that figure with barely a reference to the multiple estimations investigators accepted and relied upon as fact in order to support a finding that the aircraft was overweight. The report provides no margin for error or range of weights reflecting the inherent unreliable nature present in these calculations despite these estimations being the sole information supporting the conclusion that the flight was overweight. Presenting these figures as conclusive proof without acknowledging the limitations and questionable accuracy of the estimations used in the assessment unfairly portrays these conclusions as fact when in fact, they are speculative and subjective findings.

Furthermore, there is no supporting evidence that the estimated weight and load of the aircraft caused this accident. Even if we accepted the estimated weights as accurate, 75 pounds above the recommended limit for this aircraft would have no appreciable affect on the aircraft's performance and take off. That fact is demonstrated by the accident pilot's successful execution of a step-turn takeoff with the load, a maneuver permitted by the FAA regulations.

Finally, the factual report appears to omit reference to an interview with the first witness who responded to the accident scene. That witness, who is also a pilot with personal experience flying in and out of Willow Lake, is knowledgeable as to the terrain

surrounding the lake and the accompanying wind patterns. The witness has discussed that there are often swirling winds around the bowl surrounding the lake that can result in unexpected windshear. Despite this, no mention within the factual report is made as to these potential hazards that could have impacted the accident flight.

In summation, while the NTSB's factual report attempts to set forth an objection records as to the events and testimony regarding this accident, the report relies upon a number of unverified assumptions presented as fact and omits testimony as to potential accident causes or regular hazards at Willow Lake. In doing so the report unjustifiably creates an impression of fact with regards to the accident flight being overweight and presents an implication that the weight of the load caused the accident, when those conclusions are not supported by concrete evidence.

Mike Laughlin

A black rectangular redaction box covering the signature of Mike Laughlin.

Former Owner & Party Rep