



HYANNIS, MA 02601

May 5, 2023

Via E-mail

Leah D. Read, Sr. ASI
National Transportation Safety Board – Eastern Region

Re: Party Submission – NTSB Accident Investigation (ERA21FA354)

Dear Ms. Read:

Hyannis Air Service, Inc. operating as Cape Air prides itself on having implemented a robust Safety Management Systems (SMS) and having a positive safety culture. These two components promote reviewing and assessing safety risks to enhance operational safety based on any lessons learned from past events. As a party to the ongoing investigation, Hyannis Air Service was able to use the information that was shared by the National Transportation Safety Board to make timely safety enhancements to prevent future occurrences. Hyannis Air Service submits this letter to outline the following safety improvements implemented as a result of the accident on September 9, 2021, in Provincetown, MA. The following is a list of those safety improvements:

1. Revised the company Go-Around policy
2. Revised the company Stabilized Approach policy
3. Revised the company Short Runway policy
4. Revised the company Passenger Briefing policy
5. Enhanced the visibility of the aircraft lower air stair door handle

All policy revisions have been communicated to current crew members via electronic company memoranda and all applicable training materials have been updated accordingly. Compliance with policies is verified through our recurring check events and continuing operational safety oversight.

Further details of each safety enhancement are outlined in the following pages.

Respectfully,

Nicholas J. Kleoppel
Vice President of Safety
Cape Air



Hyannis Air Service, Inc. Safety Improvements

1. Revised Go Around Policy

Overview – The company revised its go-around policy based on the results of the performance assessment which noted that the better option in the accident sequence would have been to accept a runway overrun instead of attempting a go-around. The new policy defines the latest point in the landing attempt by which a go-around can be initiated, the touchdown zone, and when a go-around maneuver is prohibited. This enhances safety by guiding crew decision making during a critical phase of flight.

New Policy

Landings will occur in the touchdown zone. If it is determined that a touchdown will not occur in the touchdown zone, a go-around must be initiated immediately. Once the airplane has landed, the aircraft is committed to stopping, and a go-around will not be attempted.

Go-Around maneuvers are a no-fault event and should be executed anytime a pilot determines the continuance of an approach is unsafe.

For the purposes of this section, a touchdown zone is defined as the first 3,000 feet of the runway beginning at the threshold or the first 1/3 of the total available landing distance, whichever is less.

2. Revised Stabilized Approach Policy

Overview – The company revised the stabilized approach policy to ensure aircraft are appropriately configured and at the correct energy state throughout the approach and landing. This enhancement establishes “gate” requirements at specific altitudes to provide narrowing criteria for a safe transition from an approach to landing.

New Policy

All approaches are to be flown in adherence with the following Stabilized Approach concept. Several altitude gates are established with criteria that lead to a smooth transition from arrival to landing.

IFR Approach

- *Gates reference altitudes above DA or MDA.*
- *Wings should be level on final when the aircraft reaches 300 feet above airport elevation when conditions allow during circling approaches.*



VFR Arrival or Visual Approach

- *Gates reference altitudes above TDZE.*
- *Electronic and visual guidance (horizontal and vertical) must be used if available.*
 - *e.g., VASI, PAPI, GS/GP, LOC, RNAV*
- *Wings should be level on final when the aircraft reaches 300 feet above airport elevation when conditions allow.*

Altitude Gates Requirements

By 1000'

- *Aircraft Configuration – gear down, flaps as required*
- *Course/Glide Slope – established within ½ scale on IFR approach*
- *Airspeed – Max V_{app} +20 / Min V_{ref} for flap configuration*
- *Descent Rate – Max 1000 fpm*
- *Bank angle not to exceed 30° with coordinated flight*

By 500'

- *Airspeed – Max V_{app} +10 / Min V_{ref} for flap configuration*
- *Course/Glide Slope – established within ¼ scale on IFR approach*

By DA/MDA (200' VFR)

- *Airspeed – Max V_{app} / Min V_{ref} for flap configuration*

Notes:

A go around is mandatory if:

- *All criteria are not met by 500 feet or,*
- *An approach becomes unstable below 500 feet*

The following items must be included in the approach briefing when applicable:

- *Approaches that require a rate of descent greater than 1000 fpm*
 - *A rate of descent more than 1500 feet per minute is never permitted.*
- *Adjusting glide path for wake turbulence considerations*

Aircraft NPH and FCOM manuals contain arrival and approach procedures to fly stabilized approaches in the specific aircraft.

3. Revised Short Runway Policy

Overview – The company revised the policy for operating into short runways to reduce the likelihood of insufficient braking upon landing. The revised policies reduce the allowable tailwind component and add limitations for heavy rain and RCAM values (when available).



New Policy

Approaches to landings on Company-defined Short Runways are permitted under the following conditions:

- *The tailwind component for the landing runway is less than 3 knots.*
- *The aircraft approach is stabilized as defined in 2.18.8.*
- *Heavy rain must not be present on the field.*
- *The PIC conducts the approach and landing. (This restriction does not apply if the PIC is an OE Check Pilot).*
- *RCAM value (if reported) for all portions of the landing runway cannot be reported at “4” or worse or pilot reported braking action of “medium” or worse (if reported). The absence of a report is not prohibitive.*

4. Revised Passenger Briefing Policy

Overview – The company expanded the policy and guidance for flight crews to use when conducting required passenger briefings. Verbal briefings must include the location AND means of opening each door in addition to referencing instructions on the briefing card. The guidance will enhance the ability for passengers to operate the doors during egress.

New Policy

Before each takeoff the Pilot-in-Command will ensure that all passengers have been orally briefed on:

- *Smoking – Smoking, including the use of electronic cigarettes, is prohibited on all flights.*
- *Use of Safety Belts, including instructions on how to fasten and unfasten safety belts.*
 - *Seat belts will be fastened during takeoffs and landings and during periods of turbulence. Suggest that seat belts remain fastened throughout the flight for the passengers’ continued protection against unforeseen turbulence.*
- *Location and Means for Opening the Passenger Entry Door and Emergency Exits – Determine at the time of briefing that access to the emergency exits is not blocked by passenger carry-on luggage or cargo. If a stretcher patient or a disabled passenger is on board, take care that they are located where they will not interfere with rapid emergency evacuation.*
- *Location of Survival Equipment if installed.*
- *Location of Flotation Devices.*
- *The location and proper use of the fire extinguisher.*
- *Location of Safety Briefing Card.*

- *Location of Medical kit, if installed.*
- *Use of Portable Electronic Devices –*
 - *C402 and P2012: Cellular devices are to be placed in airplane mode or turned off and are not allowed to be turned on until inside the terminal building. Devices must be secured for takeoff and landing.*
 - *BN2: Cellular devices are to be turned off and are not allowed to be turned on until inside the terminal building. Devices must be secured at all times.*
- *FAA requirement to comply with crewmember instructions.*

Before each takeoff the Pilot-in-Command shall ensure that each person who is the assistant of another traveler who may require assistance exiting the aircraft has received an individual evacuation briefing.

5. C402 Lower Airstair Door Handle

Overview – The company has painted all Cessna 402C aircraft lower airstair door handles red in an effort to make the handle more easily visible in case of an emergency evacuation. Post accident, the lower airstair door was found in the upright/closed position and able to function normally. Additionally, passengers did not indicate that they attempted to open the lower airstair door. This enhancement improves the ability for passengers to see and operate the door during egress.

Door Handle Painted Red

