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P.R.O.P.

Part 135 Regulated Operators Partnership

September 27, 2004

Clarence Kanae  
Aviation Safety Inspector  
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Honolulu, HI 96819-1842

OST-1999-2833-37  
OST-1999-6502-27  
OST-2000-6773-20

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Aloha Clarence,

Please accept this letter as follow up to our conversation on September 1, 2004 about a continuing potential hazard to passenger safety at the Kahului Airport. I am writing on behalf of Part 135 Regulated Operators Partnership (PROP), a coalition of scheduled commuter, on demand, and air tour operators in Hawaii.

As you are probably aware, Island Air has already increased the number of operations in and out of Kahului by a substantial number and is reportedly on their way to a five-fold increase in operations there. Island Air seems to have an operating policy of leaving one engine running on the passenger ramp for protracted periods of time, presumably to save cycles on the engine. This creates a potential hazard to wayward passengers and others as no one monitors the area surrounding this extremely lethal instrument.

Additionally, they make little effort to control the path their passengers take as they travel from the gate to the plane and vice versa. Consequently, they are strung out between the gate and aircraft while other aircraft are attempting to enter or exit the CAT ramp. Every other air carrier using the commuter terminal, except for the sporadic appearance of Inter-Island Airways, utilizes aircraft of nine seats or less. In essence, virtually every other user of that ramp could have an aircraft present yet there would still not be the flood of passengers trying to weave their way through a labyrinth of spinning propellers that two Island Air planes create. This free-for-all takes place without the benefit of ground control, ramp control, or any government oversight whatsoever. As you may well remember, Hawaii is not immune to propeller accidents. Just a few short years ago, a life threatening injury occurred in an encounter with a spinning propeller on a far less congested ramp than Kahului.

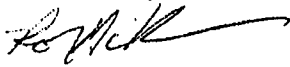
Island Air has been offered space at the main terminal, but they have summarily refused it. In the Main Terminal, there are many available gates designed for access to Dash 8 aircraft. The Commuter Terminal was created to handle normal category aircraft with 19 or fewer seats that serve rural Hawaii airports. It seems clear that Island Air has chosen a business model using large transport category aircraft that more appropriately lends itself to operations out of the Main Terminal just like they use at Hilo, Kona, and, Lihue. As you may remember, when Mahalo Airlines began service to Kahului with similar size aircraft they were sent to the main terminal without debate, in the interest of safety.

Pacific Wings Limited – Mokulele Flight Service – Hawaii Air Taxi – Paragon Air  
Maui Air – Georges Flying Service – David Turk

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I shudder to think about the public outcry if a serious injury or worse yet, a death occurred when several different branches of state and federal government could have acted in advance to mitigate an inherently dangerous situation. I struggle to understand why the condition is tolerated that forces commuter passengers to run a gauntlet on a ramp designed for normal category aircraft, especially when a solution that is so intuitively apparent exists. I ask for your assistance to use the Federal Aviation Administration's mandate for public safety to launch an investigation to determine some "best practices" before an inevitable tragedy occurs. Thank you for your help with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob McKinney", with a long, sweeping horizontal stroke extending to the right.

Rob McKinney  
Spokesman  
Part 135 Regulated Operators Partnership