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Territories Legislative Assembly

Box 1320,
Yellowknife, N.W.T.,
X1A 2L9.

February 13, 1984.

Mr. Larry Rodewolt,
A/Controller of Civil Aviation,
Department of Transportation,
9th Floor, Federal Building,
Edmonton, Alberta,
T5K 1G3.

Dear Mr. Rodewolt:

I am writing to you on behalf of my constituents, the residents of Grise Fiord, Northwest Territories. Early in January of this year it came to my attention that many people flying from Resolute to Grise Fiord were becoming concerned with passenger safety.

The aircraft in question is a Twin Otter operated by Ken Borek Air Ltd. A space between the passenger compartment and the flight deck is adapted to carry freight. The size of this freight area varies according to the number of passenger seats needed on a particular flight. I have several concerns with respect to this situation:

1. The on-board freight blocks visual access to signs indicating seat belt use and smoking/no smoking.
2. The on-board freight prevents all visual and aural communication between the pilot and passengers.
3. The on-board freight completely blocks the passageway between the flight deck and the passenger compartment.

In the event of an emergency situation the freight would effectively prevent the pilot from communicating safety/evacuation procedures that might be necessary to save lives. Similarly, an emergency situation in the passenger compartment would be difficult, if not impossible, to communicate to the pilot. Even under normal circumstances the pilot cannot remind passengers about general safety (i.e. seatbelts and smoking).

To support my concerns for safety aboard the Ken Borek Air Ltd. Twin Otter, I would like to cite the following:

1. Federal Aviation Regulation 23.853 (c) and (2) which refers to the requirement that no-smoking signs should be visible when illuminated.
2. Air Navigation Order Series II No. 2/ CRCC.-28 which states (section 7) that the pilot must be able to instruct the passengers on the use of seatbelts by visual or aural means.
3. Air Navigation Order Series VII No. 3 which mentions (section 41(2)) that when there is no cabin attendant, the pilot must be able to exercise supervisory control over passengers by visual or aural means.
4. Department of Transportation Information Circular 0/6/65 (May 28th) which states, in section III under 'Carriage of Cargo in Passenger Compartments' that freight must not block the aisle between the crew and the passenger compartment.

I can acknowledge that my interpretation of orders and regulations may not stand up to the scrutiny of those better acquainted with the legislation than myself. However, I cannot emphasize strongly enough my belief that a strict interpretation of the law should never take precedence over the objectives of the law; in this case, an assurance of passenger safety on commercially operated aircraft.

I am therefore requesting that your office look into this matter with all possible haste. Please note that I have included with this letter copies of the regulations and orders cited as well as the signatures of my constituents who have been concerned about safety on the Ken Borek Air Ltd. Twin Otter flying from Resolute to Grise Fiord.

Yours Sincerely,



Ludy Pudluk, MLA,
High Arctic.

