

based on the assessment of acceptable risk. According to AC 120-92B, a certificate holder must apply safety risk management when any of the following changes occur: (1) implementation of new systems, (2) revision of existing systems, (3) development of operational procedures, or (4) identification of hazards or ineffective risk controls through the safety assurance processes identified in AC 120-92B.<sup>60</sup>

Safety assurance evaluates the continued effectiveness of implemented risk control strategies and supports the identification of new hazards. Safety promotion includes training, communication, and other actions to create a positive safety culture within all levels of the workforce. The FAA states in its guidance that scalability is an important concept for SMS that allows its four components to be applied to air service providers both large and small, including single-pilot operations. To demonstrate the scalability of SMS, the FAA released a video that described a process for SMS implementation at small aviation service providers. The video referenced a speech from a former FAA administrator, who stated that “no company is too small for an SMS.”<sup>61</sup>

### 1.11.3 Postaccident Safety Actions

On June 1, 2019, as a result of this accident, an updated letter of agreement (LOA) was published by a group of 14 Ketchikan commercial operators. Originally created on January 15, 2009, the LOA is intended to foster voluntary compliance with the routes, procedures, and safe practices established for operating in the Ketchikan and Misty Fjords National Monument Wilderness area. The changes specifically addressed in the revised LOA were:

- Anti-collision lights, “pulse” lights or aircraft landing lights shall be on at all times when aircraft are being flown.
- All company aircraft are equipped with and use ADS-B Out and In at all times.
- No company aircraft will fly in the Ketchikan Lakes area.
- All company aircraft will stay over water as much as possible on standardized tour routes.
- All company aircraft will follow the route [on page 8 of the LOA] for the George Inlet tours, which is over water and out of the Ketchikan Lakes area.
- All pilots will announce position reports at all reporting points identified in the agreement.

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<sup>60</sup> AC 120-92B, “Safety Management Systems for Aviation Service Providers,” provides guidance for Part 121 air carriers that are required to implement an SMS program in compliance with 14 *CFR* Part 5. The FAA SMS Voluntary Program also provides non-Part 121 operators a gap analysis tool to identify hazards that need to be addressed to comply with the SMS Voluntary Program standard.

<sup>61</sup> For more information, see the [“Safety Management System \(SMS\) for Small Operators” video](#).

Taquan Air was one of the operators that signed the LOA. Additionally, Taquan Air had each of its pilots sign a document stating they read and fully understood the LOA and agreed to comply with it.