



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

Department of Transportation and  
Public Facilities

OFFICE OF THE COMMISSIONER

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March 17, 2020

Mr. Kevin Schlemmer  
Chief, Essential Air Service Division  
Office of Aviation Analysis  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Essential Air Service at Diomedes (DM2)  
**DOCKET DOT-OST-2020-0020**

Dear Mr. Schlemmer,

On February 26, 2020 the U.S. Department of Transportation (USDOT) issued an "Order Requesting Proposals" from air carriers interested in providing Essential Air Service (EAS) at Diomedes Island. Diomedes is one of the most remote communities in the nation, located in the Bering Strait approximately 135 miles northwest of Nome, Alaska. Moreover, the Arctic marine environment makes travel in that region challenging at any time of the year. The Alaska Department of Transportation and Public Facilities (DOT&PF) offers comments to help USDOT determine an optimum level of air service at Diomedes that would support the community's basic life, health, and safety needs.

The community depends on scheduled air service to provide passenger and freight services for their basic connection to the national aviation system, access to routine medical services, and general economic well-being. Due to Diomedes's remote location, air service is their only mode of scheduled transportation, which is currently subsidized through the USDOT Air Transportation to Non-Eligible Places (ATNEP) program that required a 50% grant funding match from the State of Alaska. However, the U.S. Congress is ending the ATNEP program as of June 30, 2020 and for the first time made Diomedes eligible for participation in the EAS program.

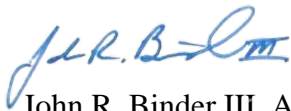
The federal enabling legislation requires USDOT to consult and collaborate with the State of Alaska on matters regarding EAS in Alaska. Title 49 U.S. Code § 41732 Basic essential air service (b)(1)(B) says "for a place in Alaska, a level of service at least equal to that provided in 1976 or 2 round trips a week, whichever is greater, except that the Secretary of Transportation and the appropriate State authority of Alaska may agree to a different level of service after consulting with the affected community." In this regard, the Native Village of Diomedes passed and provided Resolution No. 2020-20 to DOT&PF that requests EAS to consider a minimum of 52 round trips to Nome per year.

While the State of Alaska continues to assert local residents are generally best positioned to comment on particular schedules and air carriers, I request that you give due consideration to the remote geographic location of Diomede and the proposed seat and weight capacity by any air carriers that may respond to your "Order Requesting Proposals." In this regard, scheduled air service is always a matter of the trade-offs between weights of passengers, freight, mail, fuel, and schedule frequency. Safety and capacity require an appropriate airframe and schedule to provide adequate passenger and cargo to serve the needs of a community.

Thus, DOT&PF urges EAS to seriously consider proposals that would provide scheduled service with 52 round-trip flights per year, or an average of at least one flight per week to accommodate the community's needs and the Bering Strait's notoriously poor weather. DOT&PF considers the Native Village of Diomede's request for a minimum of 52 round trips per year to be reasonable and a request that we support.

Finally, I am writing you to express my strong support for continuation of the EAS program in Alaska and to emphasize the crucial access it provides to the national aviation transportation system for our remote Alaskan communities. As always, I respectfully urge Congress and USDOT to fully support and continue EAS in Alaska.

Sincerely,



John R. Binder III, A.A.E  
Deputy Commissioner