



August 27th, 2020

Patrick W. Sullivan
Principal Operations Inspector
Federal Aviation Administration, Denali CMO 949
949 E. 36th Ave, Suite 600
Anchorage, Alaska 99508-4361

Letter of Intent for Exemption No. 18512B

Dear Inspector Sullivan:

Corvus Airlines, Inc. dba Ravn Alaska is a Part 119 certificate holder (7C7A855N) that intends to utilize the provisions of Exemption No. 18512B. Once authorized through Ops Spec A005, the exemption will be utilized in accordance with the following tables for our Approved Flight Operations Training Program (FOTP). Corvus Airlines, Inc. will comply with the conditions and limitations as set forth in the exemption.

Due to the COVID-19 pandemic, performing required emergency drills to include donning of oxygen masks, PBEs, performing CPR drills, and donning training life vests increases the possibility of COVID-19 transmission. This exemption allows crewmembers completing the recurrent and/or upgrade training, checking, and evaluation events listed below to perform the listed required tasks with an Alternate Method of compliance.

The following table identifies the Alternate Methods of compliance for each specific training/checking/evaluation events required for crewmembers during recurrent and upgrade events. Only the listed alternate methods of compliance may be used in order to satisfy the requirement.

Alternate Methods of Compliance for Emergency Equipment Training, Checking, and Evaluation during COVID-19 Pandemic		
Event	Requirement	Alternate Method
121.409(b)(2)(i) Recurrent simulator Training-(a)-(d) emergency procedures	Donning of Pilot Oxygen Mask	Crewmember will simulate donning of O2 mask to the instructor or evaluator by verbalizing actions performed on mask and performing appropriate hand motions to don the mask.
121.417(c)(2)(i)(C)-(D), (E)(4) and 121.427(b)(2) emergency drills in recurrent ground training	Operating each type of oxygen system to include protective breathing equipment	Crewmember will simulate donning of the oxygen system to the instructor or evaluator by verbalizing actions performed on device and performing appropriate hand motions operate the device.
	Donning, use, and	Crewmember will simulate donning

	inflation of flotation means	of the device to the instructor or evaluator by verbalizing actions performed on device and performing appropriate hand motions operate the device.
	Donning and inflation of life preservers	Crewmember will simulate donning of the vest to the instructor or evaluator by verbalizing actions performed on device and performing appropriate hand motions operate the device.
121.424(a)(1) upgrade flight training	Donning of Pilot Oxygen Mask	Crewmember will simulate donning of O2 mask to the instructor or evaluator by verbalizing actions performed on mask and performing appropriate hand motions to don the mask.
121.427(b)(2) ground training for in-flight medical events	Multiple inflight passenger medical events as denoted in the Flight Operations Training Manual and Flight Attendant Manual as appropriate	Crewmember will simulate required events by verbalizing actions performed and performing appropriate hand motions to perform the tasks on a passenger.
121.427(d)(1)(ii) recurrent flight training for pilots in accordance with 121 appendix F	Donning of Pilot Oxygen Mask	Crewmember will simulate donning of O2 mask to the instructor or evaluator by verbalizing actions performed on mask and performing appropriate hand motions to don the mask.
121.427(d)(2) recurrent flight training for flight engineers	N/A for Carrier	
121.441(b)(1) pilot proficiency check as set forth in appendix F of part 121	Donning of Pilot Oxygen Mask	Crewmember will simulate donning of O2 mask to the instructor or evaluator by verbalizing actions performed on mask and performing appropriate hand motions to don the mask.
121.8056(b)(5)(iii) flight attendant recurrent training drills in CPR	CPR Drills	Flight Attendants will simulate CPR drills on an imaginary dummy and verbalize to the instructor the required techniques.

Other Restrictions with Corvus Airlines' use of this exemption:

- This relief applies to the requirements for recurrent training for crewmembers and to pilots completing pilot in command upgrade training who were previously qualified on the same airplane type as second in command.
- The relief does not apply to requirements for the training and qualification of new personnel and/or initial flight attendant training.
- Any crewmember that performs emergency drills or performance drills utilizing the alternate method above must complete the drills using the normal procedures during the person's next regularly scheduled recurrent ground training or within 12 calendar months (plus grace month) of the event in which the use of these alternative methods was utilized, whichever is earlier.
- This exemption allows alternate methods of compliance only for subsequent operations in the United States.

Use of this exemption will be terminated on November 30, 2020 unless sooner superseded or rescinded, or otherwise extended. I have attached a Safety Risk Assessment to this letter to manage the risk associated with the change.

Best Regards,



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