



May 25, 2021

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 St. Paul Island, Alaska (SNP)  
**DOCKET DOT-OST-2019-0038**

Dear Mr. Schlemmer,

Thank you for the opportunity to comment on Essential Air Service (EAS) at St. Paul Island. St. Paul is located 766 miles southwest of Anchorage, Alaska in the middle of the sub-arctic Bering Sea, and requires flying across 335 miles of open-ocean. Furthermore, the Bering Sea has notoriously bad weather that routinely forces flight cancellations. Due to St. Paul's remote location, air service is their only form of scheduled transportation. The community depends on scheduled air service for passenger, freight, and mail service for their basic necessities, routine medical services, and general economic well-being.

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 St. Paul Island and the proposed seat capacities by airlines. In this regard, scheduled air service is always a matter of the trade-offs between passengers, freight, mail, fuel, and schedule frequency. Safety and capacity require an appropriate airframe to provide adequate passenger and cargo service to accommodate the needs of St. Paul Island's residents and businesses.

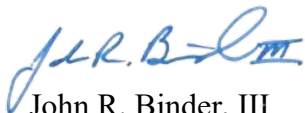
The *Essential Air Service Determination for Alaska Communities* indicates there were three (3) departures per week historically, and I would like to point out that the report also indicates a "Large" aircraft type for St. Paul which meant an aircraft with at least a 60-seat capacity. This equaled at least 180 seats available for passengers per week, which translates into an equivalent capacity of 7 departures per week using a De Havilland Dash-8 aircraft. In this regard, I urge EAS to seriously consider proposals that could provide scheduled air service that could provide at least 180 seats per week to accommodate the community's needs and the Bering Sea's poor weather.

Additionally, I want to point out that significant air charter enplanements to St. Paul are not reported typically to the U.S. DOT. This underreporting leaves the impression of less demand for air service than what is actually occurring at the St. Paul airport.

Regardless of the proposal that US DOT selects in this current Request For Proposal process, I want to ensure that St. Paul Island continues to be eligible for the "Large" aircraft type. Furthermore, I would not want a selection of a proposal that offers air service with an aircraft that has fewer than 60 seats to be considered precedent setting.

Finally, I am writing you to express my strong support for the Essential Air Service program in Alaska and to emphasize the crucial access EAS provides to our remote communities. I respectfully urge the U.S. DOT to support and continue EAS in Alaska.

Sincerely,



John R. Binder, III  
Deputy Commissioner