



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

535 HERNDON PARKWAY □ P.O. BOX 1169 □ HERNDON, VIRGINIA 20172-1169 □ 703-689-2270
888-FLY ALPA (888-359-2572) □ FAX 703-689-4370

April 28, 2006

Ms. Lorenda Ward
National Transportation Safety Board
Major Investigations (AS-10)
490 L'Enfant Plaza East, SW
Washington, DC 20594

Re: Pinnacle Airlines Flight 3701, DCA05MA003

Dear Ms. Ward:

The Air Line Pilots Association, Intl. (ALPA) submits the attached comments concerning the accident involving Pinnacle Airlines (d.b.a. Northwest Airlink) flight 3701, which occurred on October 14, 2004 in a residential neighborhood of Jefferson City, Missouri. Our comments represent ALPA's analysis of the facts obtained from the NTSB's investigation and additional post accident research. This submission contains safety recommendations that are intended to prevent similar future accidents.

The investigation revealed that an engine characteristic referred to as 'core lock' contributed to this accident. Core lock can preclude a timely in-flight restart, yet there is no evidence to indicate that those who need this information the most, the CRJ operators and flight crews, knew anything about this phenomenon. Furthermore, the airframe manufacturer and the certifying agencies failed to ensure that the operators and flight crews were provided with clear and effective emergency procedures that would prevent a CRJ from experiencing this phenomenon.

Additional safety issues identified during this investigation include PCL flight crew training deficiencies, design of the CRJ dual engine failure checklist, and CRJ simulator fidelity.

ALPA appreciates the opportunity to have participated as a party to the investigation and hopes the attached submission, findings and recommendations will be of assistance as the Board concludes its investigation.

Sincerely,

Captain Aaron Rose
ALPA Coordinator

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Attachment