

Docket No. SA-530

Exhibit No. 12-E

NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

FAA Memo (AFS-1)
Large HEMS Resource Needs

(5 Pages)



Federal Aviation Administration

Memorandum

Date: JUN 14 2006

To: All Regional Flight Standards Division Managers

From: James J. Ballough, Director, Flight Standards Service, AFS-1 

Subject: Helicopter Emergency Medical Service (HEMS) Resource Needs (Large Operators)

Flight Standards has been focusing on safety in HEMS operations for much of the past year. Late in 2005, a team was established to review the resource needs for large HEMS operators. The team's primary focus revolved around the certification management teams for large HEMS operators. The attached report provides the team's recommendations for optimal certificate management team composition for the large HEMS operators.

While I accept the team's recommended staffing levels, resource constraints prevent staffing to those levels at this time. Consequently, I have decided to staff to the 70% level of the team's recommended levels. After gaining experience using the surveillance evaluation program (SEP) at the 70% level of staffing, an appraisal will occur to determine if it is necessary to staff to the full levels recommended by the team.

End of year employment levels for all regions issued for FY-06 already provided an indication of additional hiring needed for HEMS. With the combination of new inspector hiring in FY-06 and reassignments, it is expected that all regions with responsibilities for oversight of the largest HEMS operators will begin adjusting their staffing resources for the affected certificate management teams (CMT). It is further expected that in FY-07, these CMT's will grow to 70% of the team's recommended staffing levels. Funding for personnel change of station moves is available if reassignments are identified.

I have asked AFS-100 to monitor our progress for staffing to the 70% level. In order for them to do this, they will periodically ask divisions with large HEMS operators for updates in staffing to these levels.

If you have any questions regarding the report or CMT staffing, please contact Brad Pearson.

Attachment



**FEDERAL AVIATION ADMINISTRATION
MEMORANDUM TO THE DIRECTOR
FLIGHT STANDARDS SERVICE**

From: Brad Pearson, ANM-200, 425 227-2202

Prepared by: Brad Pearson, ANM-200, 425 227-2202

Date: May 3, 2006

Re: Helicopter Emergency Medical Service (HEMS) – CMT
Resource Team

Background: In the last quarter of CY-05, a Helicopter Emergency Medical Service (HEMS) CMT Resource Team was authorized by AFS-1. With the exception of one aircraft certification team member, the makeup of the team is from Flight Standards (see Attachment 1). The team's purpose is to recommend the resource needs of certificate management teams (CMT's) of the large HEMS air carriers. Thus far the team convened three times by teleconference and met once at the Southwest Regional Office.

Purpose/Goal: The team's purpose is to recommend the resource needs of certificate management teams (CMT's) of the large HEMS air carriers. Attachment 2 depicts the team's recommendations for the optimal sizes of CMT's for the large HEMS air carriers.

The following conditions are linked to the team's recommended CMT sizes:

1. A large HEMS operator is defined as an air carrier operating 25 or more helicopters dedicated to HEMS flight operations. Operations specifications do not depict this information. To identify the large HEMS operators, numerous phone calls were made by one team member to FSDO's. The effort identified eight large HEMS operators.
2. The surveillance and evaluation program (SEP) will be used by large HEMS CMT's for identifying risks and targeting surveillance activities. SEP is considered to be a more effective and efficient surveillance program than traditional, event-based surveillance.
3. Principal inspectors are assigned *only one* large HEMS carrier (including its repair station) and are graded at the FG-14 level. For this to occur, position descriptions will need to be classified by the AFS unique classification panel at the FG-14 level. Given the importance of large HEMS carriers to the public and the FAA, the current complexity

guide does not provide enough points to them. For example, the PMI of Air Methods is assigned to only this air carrier and its repair station. The total complexity points for this PMI are 1468 points. Air Methods operates 103 helicopters in HEMS at 46 stations. In addition, they have a large and active repair station. Given the agency's human resource criteria, an assistant principal cannot be assigned to a FG-13 principal.

4. ASI's assigned to large HEMS operators are dedicated to that operator and CMT. This is necessary to assure adequate commitment of the ASI's assigned to large HEMS operators. It can be viewed as akin to the way domestic air carrier CMT's function.
5. ASI's performing "geographic" work on large HEMS operators will be part of the CMT and typically based at the CMT's location. This is similar to a learned "best practice" from ATOS. Using this approach will result in high quality geographic surveillance and will assure completion of important geographic work. Geographic surveillance is important work for large HEMS operators. This point is made because large HEMS operators have many stations and very distributed operations.
6. Sufficient travel money is needed by large HEMS CMT's in order for geographic surveillance to occur. The team considers large HEMS CMT's to be engaged in some of Flight Standards higher priority work. Consequently, large HEMS CMT's should be funded sufficiently to perform their work.

The team's recommendation for the sizes of CMT's is based mostly on the collective experience and expertise of the team members. Team members were asked how many ASI's should be assigned to each certificate in order for the FAA to perform a very good job at its certificate management. In determining CMT sizes, team members assessed the fleets, numbers of stations and operating environments of the large HEMS operators.

Attachments:

Attachment 1: Team Members and Participants

Attachment 2: Recommended CMT Sizes for Large HEMS Operators

Team Members and Participants

Buehler, Larry	AFS-250	Meier, Cary	AAL-240
Cox, John *	AFW FSDO	Missal, William	AAL-240
Duncan, John	AAL-200	Olson*, Lewis, POI	SLC FSDO
Elgee, Angela	AAL-200	Pearsoil, Grant § *	SLC FSDO
Fletcher, Mark	FTW AEG	Pearson, Brad **	ANM-200
James, Stefany ***	ASW-103	Phillips, Johnny	ASW-230
Keenan, Joe	AFS-220	Rigsby, Matt	ASW-112
Keesler, Paul, PAI *	BTR FSDO	Sparrow, Harlan	AFS-250
Kirby, James	ANM-230	Talmadge, Robert	BTR FSDO
Lesitsky, Robert, PMI *	SLC FSDO	Wadsworth, George	ABE FSDO

* HEMS SME

** Team leader

*** Facilitator

§ PASS Representative

Recommended CMT Size for Large HEMS Operators

OPERATOR	PI	API	GEO OPS/AW	CMT TOTAL	CHDO	FLEET	STATIONS
BAQA - CJ SYSTEMS AVIATION GROUP INC	3	3	3/2	11	EA03	117	62
<i>QMLA - AIR METHODS CORP</i>	3	3	3/2	11	NM03	103	46
<i>A1UA - LIFENET INC</i>	3	3	3/2	11	CE03	80	44
RMXA - OMNIFLIGHT HELICOPTERS INC	3	3	3/2	11	SW05	58	37
HEEA - PETROLEUM HELICOPTERS INC	3	3	3/2	11	SW03	56	58
EVCA - AIR EVAC EMS INC	3	3	0/0	6	CE03	55	31
HDNA - METRO AVIATION INC	3	2	0/1	6	SW03	44	21
EGRA - KEYSTONE HELICOPTER CORP	3	3	0/0	6	EA17	32	26

- Note: A1UA (Lifenet Inc) is being absorbed into the QMLA – Air Methods Corp air carrier certificate; both companies are currently held under a common holding company.
- Conditions linked to the staffing recommendation:
 - A large HEMS operator operates 25 or more helicopters dedicated to HEMS flying
 - SEP is used for identifying risks and targeting surveillance activities
 - Principal inspectors are assigned only one large HEMS carrier and are graded at the FG-14 level
 - ASI's are dedicated to only their CMT
 - Geographic ASI's are based at the CMT's location
 - Travel money is available to support geographic work