

Docket No. SA-530

Exhibit No. 8 - P

NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

Submission from National EMS Pilot Association (NEMSPA)

HEMS NVG Utilization Survey Summary

(2 Pages)

Helicopter Emergency Medical Services (HEMS) NVG Utilization Survey

Survey designed and conducted by the National EMS Pilots Association
May 2008

Background

This report is a summary of the results of a survey conducted by the National EMS Pilots Association (NEMSPA) with the intent to help helicopter emergency medical services (HEMS) providers and the federal agencies that regulate them (primarily, the FAA) to formulate standards and policies for the use of night vision goggles in air medical transport. As the migration of NVG technology from the military to the civilian aviation environment continues, there is increasing interest in the contribution that this technology will make to different kinds of civilian aviation services. In particular, HEMS services are using night vision goggles in increasing numbers to provide a significant improvement in safety and the ability to transport critically injured patients during periods of darkness and in areas that would otherwise be challenging and hazardous for night operations.

At the same time, there are concerns regarding how to best utilize NVG's in a way that does not introduce additional risk to night HEMS operations as a result of the limitations inherent in the design and characteristics of the current generation of NVG's. Many HEMS pilots and a number of FAA inspectors have little or no first-hand experience flying with NVG's, and are therefore cautious and skeptical about how to best deploy NVG's in the air medical transport industry.

Since there are a growing number of HEMS pilots who are gaining considerable experience flying patient transports with NVG's under varying degrees of darkness, the National EMS Pilots Association determined to conduct a survey to gather data regarding HEMS pilots' professional opinions on the efficacy and best deployment of this technology in helicopter air medical transport. Of particular concern to experienced NVG pilots are the current restrictions regarding an NVG-aided pilot's authorization to use the goggles to complete an approach to the ground using the goggles regardless of whether or not another crewmember is also using NVG's. The informed opinions of NVG qualified pilots across the United States are presented in the survey and are summarized in the conclusion of this report. The survey is presented on the following pages along with a statistical summary of the responses and some remarks regarding the significance of the survey responses. The survey gathered a total of 382 responses. All respondents were required to be currently active HEMS pilots, although it was not required that they currently be using night vision goggles in their respective air medical transport programs.

We express our sincere appreciation to each of the HEMS pilots who participated in the survey. We expect that your responses will assist EMS providers and federal regulators in implementing policies and regulations that will result in the safest and most effective deployment of night vision goggles in air medical transport.

Conclusion

These final remarks are in behalf of the members of the Board of Directors of the National EMS Pilots Association. We are very appreciative of all those HEMS pilots who took time to express their professional opinions regarding the use of night vision goggles in air medical transport. We think that all respondents have been forthright and honest in their responses. If some have been bitingly frank in their comments, we take that as an indication of the depth of their feeling regarding the importance of night vision technology to the safety of HEMS operations.

In particular, we note the resistance to requiring pilots, if no other crewmember on board is also using NVG's, to transition from aided to unaided flight during the final minute of a night approach to an unimproved landing zone. The consensus is that removing the pilot's ability to see in the dark at that critical juncture may significantly compromise the safe completion of the approach.

We also note a lack of recommendations for Terrain Awareness Warning System or Ground Proximity Warning System technology as a viable alternative to night vision goggles. Although these systems may well have a role in improving the safety of HEMS night operations, they only warn the pilot of hazards that he cannot see. With NVG's the pilot can see, identify, and avoid hazards in much the same manner that he does during daylight flight.

Although NEMSPA and its pilot members do not deny a desire to influence the policies and regulations that will ultimately determine the manner in which night vision technology will be utilized in HEMS operations, we hope that this survey will not be seen as an attempt to pressure any air medical operator or regulatory agency to act contrary to their own best judgment. Nevertheless, the survey responses represent the opinions of the pilots who will be most affected by those policies and rules as well as of the pilots who have the greatest amount of experience to date with flying actual NVG missions in the HEMS environment. For this reason, we hope that this survey will be studied and weighed in the formulation of such policies and regulations.

Respectfully,

Gary Sizemore

President, National EMS Pilots Association