

March 8, 2009

HEMS Safety Board  
National Transportation Safety Board  
490 L'Enfant Plaza, SW  
Washington, DC 20954

To Whom It May Concern:

I am writing on behalf of Metro Life Flight in Cleveland, Ohio. Metro Life Flight is a hospital based Air Medical program utilizing Ground Ambulances, Rotor wing and Fixed-Wing aircraft. The MetroHealth System is a county owned healthcare system that has been serving the needs of Northern Ohio for 170 years. Metro Life Flight began service in September of 1982 and has completed more than 66,000 accident free helicopter EMS missions. In October of 1986, Metro Life Flight was the first in the United States to introduce the Sikorsky S-76 to EMS. The crew consisted of two IFR pilots, a flight nurse specialist and a physician. Today, Metro Life Flight operates three IFR Sikorsky S-76As, with a fourth aircraft in maintenance rotation. The staffing remains the same as the importance of two IFR pilots on all missions has been a cornerstone of this program.

In July of 2009, Metro Life Flight will begin the transition from the S-76 to the Eurocopter EC 145. The cost versus the benefits of a new Sikorsky S-76C++ drove the hospital to search for a new airframe that would meet all of the mission criteria. The new aircraft had to be fully IFR/WAAS capable, Dual Pilot Configured, Twin-Engine and capable of completing the wide variety of medical missions in the challenging environment of North East Ohio. While all agreed that there was a need for a helicopter certified to operate in icing conditions, the manufacturers were unable to provide a timely or financially reasonable offer. The design of the EC 145 cockpit was customized for Metro Life Flight to include all of the safety recommendations of the industry. The aircraft will be certified Dual/Single Pilot with the following avionics:

Honeywell Mark XXI Electronic Ground Proximity Warning System  
Garmin 430 & 530 GPS with WAAS  
Avidyne Traffic Warning System  
Radar Altimeter  
SkyConnect Satellite Flight Following System  
Honeywell Weather Radar  
Garmin XM Radar  
Full NVG Avionics  
M'ARMS Cockpit Voice and Flight Data Recorder

The MetroHealth System has remained committed to the safest operations possible. Metro Life Flight has remained financially stable for over 26 years despite the high personnel and equipment costs. We have seen many programs come and go. We have witnessed the horror of a Helicopter EMS crash affecting another program in our city. We patiently wait as the NTSB and FAA struggle to resolve this HEMS dilemma. Before the next round of recommendations is made, Metro Life Flight felt that it was important to introduce you to our program and provide our observation of this industry.

We believe that our safety record is not purely luck. We choose a model that places safety before profit, though we still are able to maintain positive financial margins. The staffing of two pilots is the simplest remedy to reducing “pilot error” induced accidents. This program has always believed safety is in redundancy, two engines, two pilots. The medical crew consists of an experienced Flight Nurse Specialist and a Flight Physician specializing in Emergency Medicine or Trauma. This medical staffing model focuses on providing timely, definitive care to the patient, stabilizing prior to flight and proceeding to the nearest appropriate medical facility. By providing this type of care, we have been able to drastically reduce the sense of urgency experienced by programs racing the “Golden Hour.”

Maintaining this operating model has not been easy. The MetroHealth System contracts its aviation services with air medical vendors. While the hospital owns the aircraft, the vendors provide the pilots and mechanics and the maintains the aircraft. Each time the contract is up for renewal, many of the vendors pressure the hospital to eliminate the second pilot. This push for a single pilot operation is purely to increase profit margins.

The biggest issue facing Metro Life Flight today is maintaining flight volume as more and more community based programs move into the region. Metro Life Flight is increasingly becoming the back up to these VFR only programs. As a county program, we maintain the IFR capabilities to ensure access to quality medical care for the region. Metro Life Flight’s responsibility is to the citizens in our region, not to stockholders or a corporate board of directors. The elimination of the “good weather” flights makes it increasingly difficult to fund the safest equipment and operations. The recent introduction of AO21 by the FAA without IFR infrastructure enhancements has made our situation worse. A program operating with single engine helicopters, single pilot, and no additional safety equipment, has the exact same weather limitations as a twin engine, dual pilot, IFR, TCAS equipped, radar and radar altimeter equipped Sikorsky helicopter.

While most, if not all, agree that dual pilot staffing would increase the safety of EMS operations, there is no incentive from the FAA to do so. Such incentives are provided for HTAWS and NVGs by allowing for lower VFR operating minimums. With the current trend in FAA rule making, it will become more and more difficult for Metro Life Flight to continue to operate. The most profitable operating model is currently single engine, single pilot. These companies will continue to only meet the minimum requirements of the FAA. The programs that stand to suffer the most are the ones that invest the most in safety. I thank you for your time and hope that your board is able to push for effective change in this troubled industry. Please do not hesitate to contact me with any questions or comments.

Sincerely,

Drew Ferguson  
Aviation Site Manager  
Metro Life Flight