

ROBINSON HELICOPTER COMPANY

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18 Feb 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structures)
National Transportation Safety Board
490 L'Enfant Plaza, SW
Room 5235
Washington, DC 20594

Dear Mr. Joshi:

Please accept Robinson Helicopter Company (RHC)'s comments regarding the National Transportation Safety Board (NTSB)'s Notice of Proposed Rulemaking (NPRM) to 49 CFR Part 830.

RHC is opposed to the reclassification of rotor blade ground damage as accidents that would result from the proposed revision to Part 830.2 (definition of substantial damage). We feel that this would place an undue burden on helicopter operators with little safety benefit.

In a blade strike, cause and corrective action to avoid future damage are normally obvious. Manufacturers have specific maintenance instructions for blade damage to ensure that adequate inspections and repairs are made before an aircraft is returned to service. Therefore, it is difficult to envision a measurable safety gain due to detailed investigations of blade strikes.

On the other hand, classifying a blade strike as an accident has a significant effect on the industry. The operator is responsible for preserving his aircraft in the incident area (which may be quite remote) until released by the NTSB. This requires operator resources and may remove the aircraft from service for an unnecessarily long period. In addition, insurance companies and industry analysts rely on NTSB accident statistics as unbiased data for evaluating pilot and aircraft safety records. The consequences of a spike in "accidents" due to reclassification of blade strikes could be devastating.

Most blade strikes are relatively minor (e.g. contact with a tree branch in a confined area) and are to some extent inevitable if the unique capabilities of the helicopter are used to their maximum. More severe strikes (e.g. as the result of rollover) already meet the definition of substantial damage/accident.

RHC strongly urges that the change to Part 830.2 be reconsidered and that simple blade strikes remain exempt from the definition of substantial damage. Thank you for your careful consideration of our comments.

Sincerely,



Pete Riedl
Vice President, Engineering