



March 9, 2005

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

RE: American Eurocopter LLC Response to NTSB Notice of Proposed Rulemaking (NPRM 427)

Mr. Joshi,

American Eurocopter LLC believes that there is limited value of the NTSB Notice of Proposed Rulemaking (NPRM 427) posted in the Federal Register pages 77150 to 77153 on December 27, 2004, that proposes to eliminate ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2.

A 'ground strike' with no other damage is already required to be reported under 14 CFR 830.5 (a). It is not a common occurrence to have a 'ground strike' involving the main or tail rotor blades without sustaining some other damage, but should that happen, manufacturers have procedures in place to evaluate the damage in their maintenance documentation. Detailed engineering support is available from manufacturers to assist and guide technicians on any situation that may occur.

The proposed change in Part 830.2 to eliminate ground rotor strikes from the exemption portion of the definition of "substantial damage" is not considered to be appropriate, and is opposed. These incidents are being reported to the NTSB now and no field investigations are occurring. The proposed regulatory change would increase the number of accidents, skew data and adversely affect the entire helicopter community.

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