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Sikorsky
A United Technologies Company

March 9, 2005 **PSL-71-05**

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

re: NPRM, Federal Register/Vol. 69, No. 247/ Monday, December 27, 2004/ Proposed Rules 49 CFR Part 830, Notification and Reporting of Aircraft Accidents or Incidents and Overdue Aircraft and Preservation of Aircraft Wreckage, Mail, Cargo, and Records

Sikorsky Aircraft Corporation (SAC), a wholly-owned subsidiary of United Technologies Corporation (UTC), as a manufacturer of medium and heavy twin-engine helicopters submits the following comments on the referenced NPRM. Text of the NPRM is shown in ***Times New Roman Italic*** font.

1. *SUMMARY: "...This amendment is intended to enhance aviation safety...so that we can investigate..."*

   SAC does not understand how the NTSB intends to support this statement. The premise is that the NTSB investigates this sort of accident is not supported by the data. The NTSB does not investigate most helicopter accidents unless there is a fatality or multiple fatalities involved. (See Bell helicopter analysis in Table 1.) In fact, the NTSB investigated only 4.1% of non-injury accidents. To significantly add to the number of non-injury accidents [of which 95.9% are currently not NTSB-investigated] will not enhance aviation safety. While SAC does not object to reporting of ground rotor strikes as incidents, we strongly object to reporting them as accidents.

2. ***Proposed Revision to § 830.2, Definitions:*** *"...by removing reference to ground damage to helicopter rotor blades from the list of exclusions..."*

   The analogy that the NTSB draws between the rotary wing and rudder and a fixed wing and rudder is not correct. Helicopters are not airplanes, and have distinct and obvious differences. Instead, one could just as easily say that the main rotor is analogous to a propeller (because it provides the sole forward motive force). A propeller *is* exempted from ground strike reporting requirements, as stated in **§ 830.5 (b)**.

3. ***Proposed Revision to § 830.2 (c):*** *"Loss of information from a majority of an aircraft's certified electronic primary displays..."*

   Current helicopter certification requirements mandate that continued flight is possible with *all* electronic primary displays inoperative. Additional reporting (as an accident) of the partial loss of these primary displays will not enhance safety.

SAC's objection to additional accident reporting follows the logic of Bell Helicopter, MDHI, Eurocopter of America, AIA, HAI, and most other industry members. The NTSB proposal, which we believe is of questionable value in enhancing aviation safety, places undue and unjustified burdens on the owners, operators, manufacturers, and insurers of civil aircraft. In addition, we do not understand how, given the current NTSB staffing levels and inability to investigate even serious injury helicopter accidents

(only 15.7% NSTB field participation over the past ten years), the NTSB plans to perform these additional non-injury accident investigations, or what the NTSB intends to do with the resulting data.

As an example, here is a scenario:

An emergency medical service aircraft is called to perform a life-saving mission. It launches from its rooftop helipad, speeding sixty miles over inaccessible terrain to a head-on motor vehicle accident. The two patients are stabilized, extricated, and loaded in the aircraft. Upon landing back at the hospital helipad, the tail rotor contacts the windsock. The patients are unloaded and prepared for their surgery. The aircraft is shut down and a sudden-stoppage inspection is performed. In accordance with the manufacturer's inspection, the tail rotor blades needed to be replaced, but no other damage was found and thus no further maintenance is required. Currently, the aircraft would be considered airworthy and could go on performing its mission, following the blade replacement.

However, if this NPRM were adopted, the aircraft would be impounded until the NTSB investigator (or more likely the NTSB-delegated FAA inspector) arrived. This could obstruct the hospital helipad from any other flight operations until the aircraft is released. The pilot, operator, owner, insurer, and manufacturer of the helicopter would have an accident charged against them, increasing expenses and public relations difficulties for all involved. The operator would of course also lose revenue for every day the aircraft is impounded.

Where is the safety benefit in this? The addition of an obvious data point (collision with fixed object) to an NTSB file, for an event with no injuries or significant consequences is not an enhancement to safety and will dilute the NTSB's resources away from more significant issues.

In conclusion, the changes proposed by the NTSB do not appear to create the intended effect of improving aviation safety; have a significant negative cost and performance impact on owners, operators, pilots, insurers, and manufacturers; and additionally, will adversely affect the already tenuous public perception of helicopter safety by artificially increasing the helicopter accident rate.

Sikorsky Aircraft Corporation appreciates the opportunity to comment on this NPRM. If you have any questions, comments, or concerns, please feel free to contact us.

Very truly yours,

Sikorsky Aircraft Corporation

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