

TIMBERLAND



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February 28, 2005

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

Reference: NPRM 427, Federal Register, December 27, 2004, pages 77150 – 77152,
Proposed Revision to 49 CFR, Part 830.2

Mr. Joshi:

I write this letter on behalf of our company in complete opposition to the proposal to eliminate the ground rotor blade strike exclusion from the “Substantial Damage” definition of 47 CFR 830.2.

We must first address the charge that this change would enhance aviation safety through the direct notification of the NTSB after such events occur. The benefit of direct notification to the NTSB of such events is questionable in the least. The likelihood of an NTSB investigator being directly involved in an event involving no fatality or even injury is near zero. Furthermore, it could be argued that the overwhelming majority of ground blade strike events do not result in injury or fatality. A more likely, and in fact, near certain result would be the increased cost to helicopter operators, pilots, manufactures and industry in general. Operators will potentially suffer through increased costs in terms of accident rates. Once an accident occurs the aircraft is “controlled by the NTSB”. This could last several days. In the case of a simple blade strike occurring on the ground, during maintenance for example, these are days that could be used to repair the aircraft for return to operation. The pilot of an aircraft involved in an occurrence requiring classification as an accident has a great deal at stake personally. A pilots record is his livelihood. Ground events classed as accidents, could unfairly skew a pilots safety record.

In conclusion, we feel that to modify the current reporting requirement by removing the ground rotor blade strike exclusion would have a negative impact on helicopter operators and pilots at a minimum, while the benefit is clearly negligible, if existent. While it

should be remembered that industry is committed to a working partnership with both the NTSB as well as the FAA to always strive to achieve a zero accident rate, this proposed change would do very little, if anything, to further that cause.

We appreciate the opportunity to comment and hope the NTSB will reconsider the decision to eliminate the ground strike exclusion from the substantial damage definition in 830.2.

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark D. Gibson', written over a horizontal line.

Mark D. Gibson
General Manager