

Joshi Deepak

From: Arichard681@aol.com
Sent: Friday, March 11, 2005 12:28 PM
To: Joshi Deepak
Subject: NTSB NPRM 427

Mr. Deepak, In response to the NTSB Proposed Rulemaking (NPRM 427) posted in the Federal Regulation pages 77150 to 77152 on December 27, 2004, that proposes to eliminate ground rotor strike exemption from the "Substantial Damage" definition of 47 CFR 830.2 wherein it would change a rotor ground strike from an incident to an 'accident'; I would recommend that there be NO CHANGES made. The NTSB would not be able to respond to all the reported 'accidents'. The amount of manpower that would be required to respond, inspect and release each 'accident' that would be reported would be impossible. What is the helicopter operator expected to do while waiting for a response? The aircraft would have to be shutdown until the NTSB responded. How do I operate a helicopter agricultural spray business that is completely dependent on the seasons? A day out of service can make all the difference when pest pressure is high and crops need to be sprayed. My business would not survive! How can we provide emergency firefighting service to the general public, property, residences and lives threatened when a minor incident requires the aircraft to be grounded as if it were an accident, waiting for the NTSB to respond? These incidents are being reported to the NTSB now and no field investigations are occurring. The NTSB is only going to the accident site on 17.7% of all U S Registered helicopter accidents under the present definition thus it is extremely unlikely the NTSB will actually do a field investigation of these new ground rotor blade strike 'accident'. The economic hardship that this rule change would put on my operation would put my business in jeopardy. If my aircraft is out of commission waiting for an inspection by the NTSB, I can't work. If my aircraft incurs too many 'accidents' I won't be able to afford the insurance. If I have to sell my aircraft because of this, it won't sell because there will too many 'accidents' reported on it. And if I have all of these 'accidents' filed against me as a pilot how am I going to be hired to work for any other company if necessary? This rule change doesn't seem to make operating a helicopter any safer. There are already maintenance instructions if in the event the helicopter should strike something (ground or in the air). It is typically called rotor strike or sudden-stoppage and calls out specific inspections. The pilot and maintenance personnel are trained to inspect the rotor blades and would be able to determine if there is any substantial damage. The pilot and maintenance personnel are not going to let the helicopter fly unless they have deemed it safe. I am of belief that the continued rule making frenzy that the government imposes on private business is not only forcing good operators out of general aviation but also others out of their specific business. California is a good example. Has the NTSB done a cost-benefit study to determine the actual cost to the operator, to the manufacturer, and to the NTSB for hiring more staff to respond to the reported 'accidents'? In conclusion I would have to say that the only resolve to this continued rule making is to STOP! And Stop Now! Sincerely, Richard Ambrosini, Ambrosini Helicopters, Inc.

3/14/2005