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Subject: Comments on SPNRM 98-4390 - 55

Sikorsky Aircraft is pleased to present the following comments on SPNRM 98-4390 "Flight Plan Requirements for Helicopter Operations Under Instrument Flight Rules":

1. Sikorsky believes that the proposed change has been long overdue and that the change is "for the good".
2. We would suggest a change in the wording from "to land at the approach threshold regardless of runway length" (top of right column page 35903) to read "to intersect and land on the circle to runway while remaining well within the airport boundary or to land along the instrument approach by appropriately pivoting into the wind". This **would** allow the pilot to proceed down the instrumented runway and turn on to the runway assigned (into the wind) before landing and not have to perform a quick stop at the approach threshold.
3. Page 35906 "Quantitative Benefits" states that many accidents are the result of helicopters trying to operate under VFR rules when they should be operating under IFR rules. The proposed change states that, if helicopters can gain access to the IFR system, an increase in safety and flexibility can be attained. This statement is based on U.S. Army data of not having an IFR related mishap in the past 16 years when using the following criteria: 400 foot ceiling, 1 miie visibility for alternate airfield planning or selection. We propose that the FAA should use the Army criteria stated above as a stepping stone and, if no problems are encountered, proceed to lower minimums.
4. We also feel that, if an aircraft is equipped with the appropriate advanced equipment (Dual Nav-coupled flight controls, Dual flight directors etc.), the aircraft should be eligible for alternate minima which are lower than in the proposed regulation.

Thank you for the opportunity to comment on this proposed rule.

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