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I have been an FAA Designated Pilot Examiner for helicopters since 1984. I have 17,000 helicopter flight hours and have conducted over 2000 flight tests in the R22 and more than 150 advanced rating tests in the R44. I would like to make the following two comments:

1. The background discussion of the NPRM states the R44 has “ operating characteristics and design features similar to the R22.” This is not completely accurate. The operating and flight characteristics of the R44 are much closer to that of the Bell 206 Jet Ranger than the R22. The R44 has a much higher inertia rotor system, similar to the Jet Ranger and has not experienced the fatal low RPM rotor stall accidents that the R22 has. Many pilots consider the R44’s autorotative qualities better than the Jet Ranger’s. Additionally, the R44 is not used as a primary trainer as is the R22, consequently, it has not experienced the numerous training accidents that the R22 has. The requirement to duplicate all SFAR 73 training in the R44 if it has been accomplished in the R22 does not enhance safety but does put a financial and operational burden on the pilot. I recommend the R44 be eliminated from SFAR 73.
2. SFAR 73 par 2 (a) (3) and par 2 (b) (1) (ii) A-D
Two important events have occurred since SFAR 73 went into effect in March 1995. First and foremost, in April 1996 the FAA revised the Helicopter Practical Test Standards for the private, commercial and flight instructor certificates. This change added the tasks “Low RPM Recovery” and Low “G” Conditions. These areas must now be included in all private, commercial and CFI training and must be tested on all practical tests. These new tasks encompass essentially all the training specified in par 2(a) and 2(b) except enhanced autorotations, which is covered in other PTS tasks. Secondly, in 1996 the FAA issued an AD that prohibits low “G” pushovers in flight. This means we cannot accomplish item (D) of 2(b)(ii) in any meaningful inflight training mode. This should have been eliminated when the SFAR we revised in 1997. I recommend the training required by par 2(a) and 2(b) be deleted leaving only the R22 make and model time requirements in effect.

I don't believe the 32 days from the date the NPRM was published and the ending date for comments is anywhere near adequate to disseminate the NPRM around the helicopter community and for respondents to make thoughtful, considered comments.

Regards,

A handwritten signature in black ink, appearing to read 'T. Tucker', with a long horizontal flourish extending to the right.

Timothy C. Tucker
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