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National Transportation Safety Board

Washington, D.C. 20594

Office of Aviation Safety

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, S.W.
Washington, DC 20590-0001

Attention: Rules Docket No. FAA-2002-13744 - / Z

Dear Sir:

The National Transportation Safety Board's Office of Aviation Safety has reviewed your Notice of Proposed Rulemaking, "Robinson R-22/R-44 Special Training and Experience Requirements," which was published in 67 FR 69106 on November 14, 2002. The notice proposes to extend the expiration date of Special Federal Aviation Regulation (SFAR) 73 (which expires December 31, 2002) to December 31, 2007. SFAR 73 establishes special training and experience requirements for pilots operating Robinson model R-22 or R-44 helicopters in order to maintain the safe operation of these helicopters. It also proposes special training and experience requirements for certified flight instructors conducting student instruction or flight reviews.

The notice was prompted by the SFAR's current expiration date of December 31, 2002, and by the FAA's finding that since the issuance of SFAR 73, there has been a drop in the rate of Robinson helicopter accidents involving low "G" maneuvers (low rotor RPM) resulting in main rotor/tailboom contact. Between the publication of SFAR 73 in 1995 and the first extension of the SFAR in 1997, no accidents occurred in the R-22 or R-44 helicopter models that were related to low rotor RPM and tailboom/main rotor contact; two such accidents have occurred since the first extension in 1997. The FAA believes that SFAR 73 has been effective in improving the safe operation of these helicopters.

The Safety Board's interest in R-22 and R-44 helicopters evolved from its special investigation¹ of thirty-one R-22 and three R-44 helicopter accidents in which the main rotor blades contacted the helicopter's structure in flight. In its investigation, the Safety Board examined the helicopter's operating parameters; pilot experience levels; and the FAA's original certification

¹ National Transportation Safety Board. 1996. *Robinson Helicopter Company R22 Loss of Main Rotor Control Accidents*. Special Investigation Report NTSB/SIR-96/03. Washington, DC.

process, certification requirements, and subsequent reviews of the R-22 certification. The Board's study indicated that R-22 and R-44 helicopters are more likely to be used by low-time, inexperienced pilots than are other more costly and complex helicopters. Before completing the study in 1996, the Board issued 11 safety recommendations (three on July 21, 1994, and eight on January 6, 1995) that were intended, in part, to urge the FAA to review helicopter standards applicable to pilot skills and abilities taking into account the control sensitivities of R-22 and R-44 helicopters. The FAA's efforts to increase the experience levels of R-22 and R-44 pilots, the awareness training of critical areas of the flight envelope, and instructor qualifications through the issuance of SFAR 73 contributed significantly to the near cessation of R-22 and R-44 loss of main rotor control accidents in the United States.

Despite the positive impact of SFAR 73, it is not required in other countries. Safety Board staff assisted in the investigation of two accidents (one occurred on July 29, 1997, in Malsch, Germany, and the other occurred on August 27, 1999, in Cornakelly, Ireland) involving Robinson R-22 helicopters that experienced main rotor loss of control. The pilots in both accidents reportedly had little helicopter flight experience and would not have met the requirements of SFAR 73. Although the FAA has no authority to enforce SFAR 73 abroad, the FAA can encourage its foreign counterparts to adopt similar requirements for the operation of R-22 and R-44 helicopters.

The proposed rule should be implemented in its entirety.

Sincerely,



John Clark
Director
Office of Aviation Safety