

From: [Lauren L. Haertlein](#)
To: [rulemaking](#)
Subject: Docket No. NTSB-2021-0005
Date: Tuesday, July 6, 2021 6:28:50 PM
Attachments: [GAMA21-38 NTSB-2021-0005-Joint Comments Form 61201.1 6July21.pdf](#)

[CAUTION] This email originated from outside of the organization. Do not click any links or open attachments unless you recognize the sender and know the content is safe.

Attached please find joint comments from the US Helicopter Safety Team, Helicopter Association International, and the General Aviation Manufacturers Association.

Lauren Lacey Haertlein, J.D., M.A.
General Counsel and Director, Safety & Regulatory Affairs
General Aviation Manufacturers Association
1400 K St NW, Suite 801
Washington, DC 20005 USA
+1 202.393.1500 (office) | +1 202.573.5482 (cell)
lhaertlein@GAMA.aero

This message may contain confidential information. If you received this message in error, do not use or rely upon it. Instead, please inform the sender and then delete it. Thank you.

The United States Helicopter Safety Team (USHST), Helicopter Association International (HAI), and the General Aviation Manufacturers Association (GAMA) appreciate the opportunity to comment on the NTSB’s proposed changes to Form 6120.1, Pilot/Operator Aircraft Accident/Incident Report.

The USHST is a public–private partnership comprised of US government and industry stakeholders committed to reducing the US civil helicopter fatal accident rate. The USHST is a partner of the Vertical Aviation Safety Team (previously the International Helicopter Safety Foundation) and a sister organization to the General Aviation Joint Steering Committee (GAJSC) and Commercial Aviation Safety Team (CAST). The USHST’s current goal is to reduce the US helicopter five-year average fatal accident rate to 0.55 (per 100,000 flight hours) by 2025.

HAI is the professional trade association for the international helicopter industry and represents more than 1,100 global companies and over 16,000 industry professionals in more than 65 countries. Each year, HAI members safely operate more than 3,700 helicopters and remotely piloted aircraft approximately 2.9 million hours. HAI is dedicated to the promotion of the helicopter as a safe, effective method of commerce and to the advancement of the international helicopter community.

GAMA is a not-for-profit international trade association representing over one hundred of the leading manufacturers of general aviation aircraft, engines, avionics, and components. GAMA’s members are also engaged in flight operations and maintenance. For over fifty years, GAMA’s mission has been to foster and advance the welfare, safety, interests, and activities of general aviation and general aviation manufacturers in the United States and abroad.

The USHST, HAI, and GAMA support the proposed changes and offers additional suggestions to better capture information specifically related to rotorcraft events. The USHST uses National Transportation Safety Board (NTSB) reports and data in the development of safety recommendations. GAMA and HAI both participate in the USHST, and GAMA also in the GA Joint Steering Committee, which use NTSB information in their data-driven safety efforts. Because the Form 6120.1 comes directly from the pilot/operator, the USHST, GAMA, and HAI have found that the information in it can be incredibly valuable.

To improve future data collection toward the development of safety recommendations, the USHST, HAI, and GAMA recommend the following:

- **Landing Gear Section:** The Landing Gear section includes options for Ski and Ski/Wheel. A considerable number of skid-equipped aircraft will be on bearpaws, which the current list will not capture. The USHST, HAI, and GAMA recommend adding a checkbox for bearpaws.
- **Additional Equipment Section:** USHST’s analysis indicates that the most common categories of fatal rotorcraft accidents are LOC, UIMC, and ALT. USHST Helicopter

Safety Enhancement (recommendation) 70 specifically calls for industry and the FAA to encourage development and installation of stability augmentation systems (SAS) and or simple autopilots in light helicopters. To help track this information, the USHST, HAI, and GAMA recommend adding SAS to the Additional Equipment section. The USHST also makes several recommendations related to enhanced vision and obstacle detection/avoidance. Accordingly, the USHST, HAI, and GAMA also recommend that the NTSB add to the Additional Equipment section checkboxes for Night Vision Goggles (NVGs) and wire strike detection/protection. The USHST, HAI, and GAMA also recommend adding a checkbox for “supplemental restraints in the cabin,” with a fillable field to indicate type of restraint and whether it functioned as intended. Finally, to advance future data analysis aimed at reducing injuries and fatalities, the USHST, HAI, and GAMA recommend adding checkbox for “other protective gear (e.g., helmets, gloves, laser protective visor or glasses, fire-resistant flight suit),” followed by a fillable field.

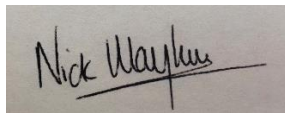
- **Airport Information Section:** In the interest of improving the applicability of the Form 6120.1 to non-fixed wing aircraft and to future technologies, the USHST, HAI, and GAMA recommend adding additional infrastructure terms to the Airport Information, including “helideck,” “heliport,” “helistop,” and “off-site landing area.” The USHST, HAI, and GAMA also recommend adding definitions for these terms to ensure that they are used appropriately.
- **Flight Time Section:** The USHST, HAI, and GAMA recommend that the Flight Time Section provide for specific documentation of rotorcraft single engine time, rotorcraft multi-engine time, rotorcraft instrument experience, and rotorcraft night experience. This pilot experience information can be especially useful in accident/incident analysis. The USHST, HAI, and GAMA also recommend that in addition to adding tailwheel time for fixed-wing aircraft, the NTSB should add Skid and Rotorcraft Wheeled time.
- **Flight Regulations / Operation Sections:** The USHST, HAI, and GAMA recommend incorporating the recordation of whether a flight was Revenue Flight Seeing or Air Medical into the existing operations options for Revenue Operation and Purpose of Flight.
- **Substantial Damage Definition:** Section B.2. defines “substantial damage” and provides examples of what damage is *not* considered substantial. Currently, the examples are airplane-centric. The USHST, HAI, and GAMA recommend adding rotorcraft-specific examples—e.g., noting that all rotor blade damage (ground or flight) should be considered minor unless the rotor blade is not repairable; damage to winglets, finlets, and the horizontal stabilizer is minor. The USHST, HAI, and GAMA also recommend that the NTSB work to harmonize its definition of substantial damage with the FAA and foreign authorities.
- **Process Recommendation:** The USHST, HAI, and GAMA encourage the NTSB to always include the Form 6120.1 in the public docket, with appropriate redactions as needed. The USHST, HAI, and GAMA also encourage the Board to distribute the form to parties to investigations as soon as practical, including before the docket is opened.
- **Improved Electronic Form:** In the interest of consistency and correctness, the USHST, HAI, and GAMA encourage the NTSB to develop a future iteration of the electronic version of Form 6120.1 that includes drop-down menus and choice fields. An

electronic form could also utilize technology to determine and flag inputs that are inconsistent and possibly incorrect.

Additionally, the USHST has developed a checklist for collecting information related to accidents/incidents reports. The USHST would welcome the opportunity to work with the NTSB to review the USHST's material in detail and further improve data collection on rotorcraft events.

The USHST, HAI, and GAMA appreciate the NTSB considering these recommendations and would be happy to provide any additional information that the Board would find useful. Lauren Haertlein (lhaertlein@gama.aero; 202.393.1500) would be happy to coordinate any discussions or requests for additional information.

Sincerely,

A handwritten signature in black ink that reads "Nick Mayhew".

Nick Mayhew
General Manager
L3Harris Arlington Training Center

A handwritten signature in black ink that reads "Wayne Fry".

Wayne Fry
Aviation Safety, GA Safety Assurance
Division Manager, AFG-500

USHST Co-Chairs

A handwritten signature in blue ink that reads "James A. Viola".

James A. Viola
President & CEO
Helicopter Association International

A handwritten signature in black ink that reads "Peter Bunce".

Peter Bunce
President & CEO
The General Aviation Manufacturers
Association