

October 10, 2013

The Honorable Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue
Washington, DC

Re: Comments on the Clearance of a New Approval of Information Collection: Helicopter Air Ambulance (HAA) Operator Reports; Correction (FAA-2013-0684)

Dear Administrator Huerta:

REACH appreciates the opportunity to comment on the data collection discussion prior to its release. While we fully support the collection of data for Helicopter Air Ambulance Operators, we have concerns with the proposal made by the FAA in the PRA Notice.

The first concern is regarding the specific information the proposal is asking for and the manner in which the operator will submit the information to the FAA. The current proposal asks for the (Number of flight requests accepted or declined and the type of each such flight request and the Time of day of each flight flown while providing HAA services). These specific requests will require the operator to provide a row of information on a Microsoft Excel Spreadsheet for each request and for each flight. This request will lead to thousands of rows of information for each quarterly time period.

For each quarter time period this operator alone will be required to submit over 10,000 rows of information if all legs associate with the patient flight are considered a flight or over 30,000 rows if each flight is considered as each leg of the overall patient transport. The collection and consolidating of this voluminous amount of data will be manpower intensive for the operator.

The second concern is the estimated man-hours that will be required to compile the data for each quarter. Due to the previously described issue regarding the amount of specific data that is being requested, the 6 hours estimate is well below the reality of what would be required. The collection of the data may require a more complex software solution, most likely necessitating the hiring of additional full-time employees at a significant cost to the company.

The last comment is regarding the specific information being requested in the proposal. The below chart provides suggestions and modification to each area of data collected. The

modifications would provide for mitigation on the above concerns while still providing for useful and needed data for the FAA and the HAA industry.

Section 44731 Requirement	Draft FAA Data Report Requirement	REACH Proposed Changes
(1) Number of helicopters the operator uses to provide HAA services and the base locations of the helicopters	Goes beyond the law to require reporting of each helicopter by registration number and its corresponding base location. Many helicopters are not assigned to a specific base; further, the base location of HAA helicopters is not static. The draft report also interprets the word “base” as base location at time of “flight activity” and is confusing – does this mean location of the helicopter or location of the base at each point of takeoff?	The FAA instead should require separate reporting of the number of helicopters flown and the bases used each quarter. Further, a requirement to report base location should use consistent methodology and not allow for alternatives based on “best judgment.”
(2) Number of flights and hours flown, by registration number, during which the helicopters were providing HAA services [Note that this is the only data point in the law requiring correlation to individual aircraft registration numbers]	Goes beyond the law to require reporting of this information correlated to base location and the other data elements.	The FAA should track the plain language of the law to require quarterly reporting of the number of flights and hours flown by registration number. Further and to avoid confusion, a “flight” should be defined to mean each flight segment involving a takeoff and landing.
(3) Number of flight requests accepted or declined and the type of each such flight request.	Goes beyond the law to require a report correlating this information to registration number, base location, time of day, total flight time, IFR time, thereby making reporting significantly more burdensome.	The FAA instead should require reporting of the number of flight requests accepted or declined and the type of the request on a quarterly basis without a correlation to registration number, base location and the other data elements.
(4) Number of accidents, if any, involving the operator’s helicopters while providing air	Consistent with the law.	The definition of “accident” should track the NTSB definition to assure reporting

ambulance services and a description of the accidents		consistency.
(5) Number of flights and hours flown under IFR while providing HAA services	Goes beyond the law to require reporting of this information correlated to registration number, base location, time of day, total flight time.	The FAA instead should require the number of flights and hours flown IFR on a quarterly basis without a correlation to registration number and base location and the other data points.
(6) Time of day of each flight flown while providing HAA services	Goes beyond the law to require reporting of this information correlated to registration number and base location and the other data points. Further, the draft report interprets this data point to mean “time of day at dispatch” but “dispatch”, a misnomer, would be the time a third party makes a call for HAA services, not the time of day the flight takes off -- what the law appears to call for. The FAA also should be aware that this data element alone is likely to result in over 100,000 reports on a quarterly basis just for AMOA members. How will a spreadsheet along the lines of the draft report accommodate this number?	The FAA instead should consider defining time of day to be consistent with the regulations defining “day” and “night”.
(7) The number of incidents, if any, in which a helicopter was not directly dispatched and arrived but not utilized for patient transport	Goes beyond the law to require reporting of this information correlated to registration number, base location and the other data points.	There is no evidence that any such incidents ever take place, but to comply with the plain language of the law, the FAA instead should require reporting of any such incidents each quarter without requiring a correlation to registration number, base location, IFR time, time of day.

Conclusion

Due to the concerns and suggestions addressed above, we urge the FAA to reconsider this proposed new information collection requirement. Again, we thank the FAA for the opportunity to provide these comments and hope to continue this important dialogue.

Sincerely,



Vicky Spediacci
VP of Aviation Operations / Director of Operations
REACH Air Medical Services