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October 10, 2013

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

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

Air Evac EMS, Inc. appreciates the opportunity to comment on this important Helicopter Air Ambulance data collection proposal. While we do support this initiative conceptually, we have concerns with the current proposal. We feel that there is an alternative method that will be more economically and administratively beneficial.

The FAA proposes that the operator be required to collect a myriad of aviation safety data on their aircraft, and to separate it in a time consuming manner that is not required by the Act. This is an unnecessary burden especially since the data contributes very little with respect to safety analysis (see table below).

The following alternative is proposed by Air Evac EMS, Inc.:

- The total number of helicopters performing helicopter air ambulance (HAA) flights.
- The total number of HAA flights (from takeoff to landing) and flight hours regardless of whether a patient is onboard. The industry collects its own data, but this data is unofficial; without a requirement from the FAA we cannot accurately measure our safety performance.
- The total number of flights flown IFR and the total number of flights flown in night conditions.
- The total number of flight requests and the number of those requests accepted.

The attached table compares the FAAs proposal to the specific requirements of the Act. It identifies our specific concerns with the FAAs proposed approach and our recommended method of data collection.

Also, it is important to note that the FAA does not clearly define key terms such as "flight," "flight request" and "dispatch."

Section 44731 Requirement	Draft FAA Data Report Requirement	Air Evac EMS, Inc. 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	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



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	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?	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 ambulance services and a description of the accidents	Consistent with the law.	The definition of "accident" should track the NTSB definition to assure reporting 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	The FAA instead should consider defining time of day to be consistent with the regulations defining "day" and "night".

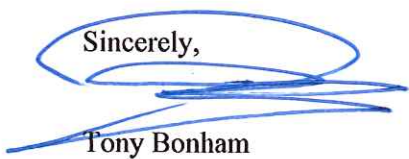


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	law appears to call for. The FAA also should be aware that this data element alone is likely to result in over 100,000 reports on a quarterly basis just for AMOA members. How will a spreadsheet along the lines of the draft report accommodate this number?	
(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.

Again, we appreciate the opportunity to provide these comments and hope the FAA seriously considers our recommendations.

Sincerely,


Tony Bonham
Senior Director of Flight Operations
Air Evac EMS, Inc.