



1920 Ballenger Avenue, Alexandria, VA 22314-2898  
703-683-4646 | [rotor@rotor.org](mailto:rotor@rotor.org)  
[www.rotor.org](http://www.rotor.org)

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*Dedicated to the Advancement of the International Helicopter Community*

October 11, 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).

Dear Mr. Administrator;

I am writing on the behalf of the Helicopter Association International (HAI) to urge you to withdraw the FAA's proposal for information collection pertaining to the helicopter air ambulance operator reports mandated by Congress in the FAA Modernization and Reform Act of 2012.

We believe that Operations Specifications are an inappropriate means of mandating or managing this type of record reporting requirement. We also believe that shortcutting the regulatory process has resulted in a proposal which falls short on many counts.

In consideration of the above comments, HAI recommends that you seriously consider the alternative proposal developed by the Air Medical Operators Association (AMOA) in lieu of implementing the proposed protocol outlined in Docket number FAA-2013-0684.

Early on in this process, prior to issuance of its original Paperwork Reduction Act notice, the FAA recognized the expertise and experience of the Air Medical Operators Association (AMOA) on issues related to record keeping of helicopter air ambulance activities. The association was invited to share its expertise and experience with the FAA and offer its comments on an appropriate approach to this data collection mandate.

HAI has a continuing working relationship with AMOA on such matters as they relate to our respective members. Accordingly HAI strongly suggests that the FAA follow AMOA's advice on the subject.

The AMOA alternative does what needs to be done. It closely adheres to the mandated data collection requirements and would focus on the relevant data that would be useful in future safety analysis; including:

- 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 on board. (Apparently, the FAA wanted to collect data only on flights where there is a patient on board. This would only tell part of the story—only about 1/3 of HAA flight has a patient on board.)
- 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.”

At the same time, the AMOA alternative would reduce the unnecessary costs and administrative burdens of the FAA proposal by eliminating the collection methodology which requires unnecessary linkage and correlation of various data elements to one another without any justification or benefit. For example the FAA proposed reporting form, would require a report correlating the total number of flight requests accepted or declined and the type of each flight request to registration number, base location, time of day, total flight time and IFR flight time. This unnecessary requirement inflates the administrative burdens and adds no utility to the data collected.

Basically, the AMOA alternative would answer Congress’ mandate; to provide the data we need to support future safety analysis and enhance safety reporting. And it would eliminate the unnecessary burdens and costs of the FAA’s original proposal.

HAI encourages the FAA to withdraw its proposal under Docket FAA-2013-0684 and follow the blueprint offered by the AMOA alternative.

As always thank you for your consideration in this important matter.

Sincerely,



Matthew S. Zuccaro  
President & COO