



Summary of Public Submissions
Received on
Robinson Helicopter Fleet Consultation

20 August 2015

Executive summary

1. The Civil Aviation Authority (CAA) issued the Robinson Helicopter Fleet Consultation Document on 23 April 2015 in response to a number of accidents involving Robinson helicopters in the last few years. The Transport Accident Investigation Commission TAIC and the CAA reviewed the American Federal Aviation Administration's (FAA) approach to regulation of the Robinson fleet and the New Zealand position. The CAA came to the conclusion that changes need to be made to Robinson safety awareness training in line with the FAA's Special Federal Aviation Rule (SFAR) 73. The purpose of the document was to consult on these proposed changes to address safety concerns in Robinson helicopter operations. The comment period for this consultation closed on 22 May 2015.
2. Over 4500 copies of the consultation document were sent out and 40 responses received: the significant majority supported the proposed changes.
3. Comments were grouped into 13 areas taken from statements of disagreement in either non-supportive or partially supportive submissions. Minor comments from those supporting the proposals were also included. Overall, 6 major themes were identified with the remaining areas largely dealing with matters of clarification :
 - a. The inclusion of the R44 and the R66 with the R22 in Robinson safety awareness (RSA) training.
 - b. The increase in training hours required to solo all types of Robinson helicopter from 10 hours to 20 hours in line with SFAR 73.
 - c. The requirement to complete Robinson Safety Awareness Training (RSA) training under a Part 141 or Part 119 organization.
 - d. The content and frequency of instructor and examiner initial and recurrent training.
 - e. The retention of enhanced auto-rotation training in RSA
 - f. The use of R22 and R44 helicopters in agricultural, lifting and Part 133 activities.
4. In light of the submissions, the CAA has recommended the following changes to the proposals contained in the Consultation document:
 - a. The R44 will be included with the R22 in any RSA training.
 - b. A decision on including the R66 in RSA training will not be made until the outcome of an impending TAIC accident report is known.
 - c. Enhanced auto-rotation will remain part of RSA training

Introduction

5. Following a number of Robinson Helicopter accidents in the last few years, and as part of the response to these accidents, TAIC and the CAA reviewed the FAA's approach to regulation of the Robinson fleet, specifically RSA and associated training contained in SFAR 73. Evidence from TAIC reports and the Robinson Helicopter Company data, endorsed by the FAA in the development of SFAR73, pointed strongly to the adoption of the same training in New Zealand

(NZ). The CAA concluded that changes to NZ's current regulations to align with SFAR 73 are necessary and recommended that they be adopted to address safety concerns raised by the accidents.

6. The proposals were set out in the Consultation document and addressed increased RSA training for all Robinson helicopter pilots, more training for ab-initio and new-to-type Robinson pilots and enhanced RSA training for instructors and examiners in RSA.
7. The Consultation Document was published on the 23 April 2015. It was published on the CAA website and over 4500 copies were sent to identified stakeholders including all Robinson helicopter owners, pilots holding Robinson type ratings, and Part 119, 135 and 141 organisations operating Robinson types. Face-to-face consultation during routine business also took place between CAA personnel and individuals and organisations operating Robinson helicopters.
8. Submissions closed on the 22 May 2015.
9. Forty responses were received with 80% of submissions supporting the proposals; of the remainder, 10% were partially supportive and the rest were critical of the proposed changes. Some organisations noted that they already follow all or part of SFAR 73 in their training. This summary is focused on the small number of submissions where criticisms or suggestions for improvements have been made.

This document

10. This document provides a summary of, and response to, the critical comments made in the small number of submissions that the CAA received during the consultation process which were partially or not supportive. For completeness, minor comment from supportive submissions has also been included.
11. From the submissions received, comment can be grouped into 13 areas: 6 were main areas of concern with the remainder largely seeking clarification on the proposals. These are highlighted with the CAA responses:

There is no requirement to lift the training requirement from 10 to 20 hours dual prior to solo

12. Seven respondents questioned the need for an increase in dual hours from the current 10 hours to the CAA-supported SFAR 73 total of 20 hours prior to solo. Some felt that the current training requirement for 10 hours was sufficiently rigorous, others that the amount of dual training should be left at a minimum of 10 hours with the final total left to the discretion of instructors. Others proposed a compromise solution of 12-15 hours training and the issue of the increased expense of additional training was also mentioned.

CAA response:

13. CAA does not agree with these comments. It accepts the following Robinson Factory statement endorsed by the FAA, that:

'In the mid 80s, 36% of R22 fatal accidents were students in solo flight (number 1 by a large margin). Through the insurance industry, Robinson Helicopters required 20 hours of dual prior to solo, the rate dropped to less than 2%. As a result, SFAR 73 require 20 hours of dual prior to solo, 10 of which has to be in an R22'.

The training focus of SFAR 73 is seen to have direct correlation with training in NZ. The TAIC accident reports point to similar issues that were identified in the statistics which informed the FAA in developing SFAR 73. On this basis, the CAA supports the alignment of NZ RSA training with SFAR 73 including the mandatory 20 hour dual requirement. We consider this forms a key part of the total package proposed for RSA training and should not be removed in isolation. It is notable that some companies in NZ already follow the 20 hour requirement in their Robinson training.

There will be a loss of experience if safety awareness training is limited to Part 141 and 119 organizations

14. Some submitters were concerned that there would be a dilution of experience if instructors currently operating under Part 61 and Part 137 were excluded from delivering RSA training by limiting its delivery to Part 141 and Part 119 organizations only. There was also comment that RSA should be delivered at an instructor's renewal and not as a separate event.

CAA Response:

15. Whilst some instructors may decide not to participate in a certified training model for the delivery of RSA training, this will be more than offset by an increase in standards for those that do decide to remain in a structured framework for RSA delivery. Greater CAA oversight will also allow more robust risk management in this key area. RSA can be performed already during an instructor's renewal at the discretion of the examiner.

Requirement for current A and B Category (Cat) instructors to complete and deliver regular RSA training

16. The need for regular RSA training for instructors and how these instructors would receive this training was questioned. Some saw no need for on-going regular RSA training for A and B Cats as it felt to be not required by 'experienced' instructors.

CAA response:

17. The CAA investigation showed a wide variety of Robinson Helicopter training standards from A Cats through to B and C Cats: results ranging from the very good to the marginal. In order to set a common standard for all, the CAA proposes to have all instructors wishing to give RSA training to have been assessed as competent by a GA flight examiner. In turn, the GA examiner doing this competency assessment will have been checked out by a Robinson Helicopter Company instructor. Following on from this initial competency check, as now, it is envisaged that recurrent RSA training would take place during routine annual instructor competency assessments at the discretion of the examiner. This would allow for a level of ongoing oversight and audit of the standard of RSA training delivery.

The removal of enhanced auto-rotation training in RSA proposals

18. Several comments were raised about the potential removal of enhanced auto-rotation training in the RSA proposals. Some argued that it should be left in to allow students to experience the sounding of the low-RPM horn. Others saw it as an integral part of the on-going debate about demonstrations of low-G handling. One commentator thought that the training should be applied to all 2-bladed helicopters.

CAA response:

19. The CAA initially considered removing enhanced auto-rotational training from RSA as it is covered in the initial training for PPL and CPL. However, after reviewing the submissions and listening to feedback, it concluded that further training as part of RSA would reinforce this earlier training and therefore be beneficial; its inclusion in RSA would also align with the content of SFAR 73. This proposal has been amended to retain enhanced auto-rotation training in RSA training.

Use of the R22 and R44 helicopters for agricultural, lifting work and operations under Part 133

20. There was concern advanced that the R22 and the R44 were unsuitable for use on agricultural operations, for lifting, and operations generally under Part 133. Overloading and design issues were cited as reasons for limiting the helicopters' use in these areas.

CAA response:

21. The issue of the use of Robinson helicopters for agricultural and Part 133 operations was outside of the scope of this review. As directed by TAIC recommendations, the CAA was to look at proposals for NZ RSA training in relation to SFAR 73 requirements. The CAA notes that the R22 and the R44 are certified in the standard category and as such they are approved for agricultural and lifting operations within the limitations of their respective Robinson flight manuals.

There should be no requirement for 1 hours flying as part of RSA training

22. There was comment from operators that the requirement for completing 1 hour practical flying as part of RSA training was not required in all cases and that it should be discretionary.

CAA Response:

23. The CAA agrees that a 1 hour practical element of RSA training should be at the discretion of the instructor delivering the 'in-flight' RSA training taking into account the experience of the pilot to whom training is being delivered.

RSA training need only focus on the R22 and exclude the R44 and R66 helicopters

24. A small number of responses did not see the necessity for RSA training on the R44 and R66 helicopters and concluded that any training should be limited to the R22. Others did not support a 12 month RSA check, while some questioned whether RSA training would be separate or completely standardised.

CAA Response:

25. SFAR 73 includes both the R22 and R44 but excludes the R66. An overwhelming majority of the submissions were in favour of a more robust oversight of RSA training and inclusion of the R44 in the 24 month check. CAA has opted to include the R44 in a 24-month review to better align with the intent of SFAR 73. The inclusion of the R66 in this training is still under review pending the outcome of the TAIC accident report into a recent R66 accident. The New Zealand Helicopter Association (NZHA) does not support 12-monthly RSA checks and this was not the intention of the CAA. The 12-month check was only to be part of a transitional arrangement to capture pilots who have never completed RSA training.

Analysis of R44 and R66 accidents

26. A few respondents questioned whether the R44 accident statistics, especially regarding mast bumping, were sufficiently conclusive to support the RSA proposal. It was also felt that any inclusion of the R66 ahead of the imminent TAIC report would be pre-emptive.

CAA response:

27. The CAA notes that the TAIC accident reports from New Zealand taken in conjunction with information from Robinson Helicopters and the FAA strongly support the inclusion of the R44 in RSA training. The R44 is included in SFAR 73 regulations. At this time, the R66 is not included in the proposals but this will be reviewed after the release of the TAIC report into the recent R66 accident.

Concern that for type rating, R22 requires 3 hours dual for solo but AC61-10 only requires 1 hour

28. There was some confusion and clarification requested over the proposed RSA training that requires 3 hours training prior to solo on type rather than the 1 hour minimum dual training required under AC61-10.

CAA response:

29. The 3 hour requirement for RSA type training includes a minimum of 1 hour dual in line with AC61-10. Thereafter the pilot under training would retain student privileges only until the 3 hour total is reached. As such, for this period the student could only fly under the immediate supervision of an instructor.

The delivery of flight examiner training

30. Clarification was sought over who would deliver initial RSA training to GA flight examiners.

CAA response:

31. It is the CAA's intention to use Robinson Helicopter Company instructor pilots to deliver training and initial competency checking of GA flight examiners to ensure standardisation in the content and delivery of this key training.

The extension of RSA training to airline examiners.

32. One query was raised regarding whether RSA training would be extended to include airline examiners.

CAA response:

33. The CAA recognises that D Cats and airline examiners can bring a wealth of experience to the delivery of safety awareness training. As such, it would be the CAA's intention that Category A, B, D and airline examiners who have been approved by an appropriately qualified GA examiner as competent to deliver RSA training could do so. The CAA sees this as an important step in ensuring competence and standardisation in the delivery of RSA training.

Provision of an Advisory Circular AC and/or other material to support RSA training

34. A common theme in many responses was the need for good standardisation of the content and delivery of RSA training. Some suggested that CAA publish an AC to better define and outline RSA while many wanted the issue of other educational material – for example DVD’s – to support training.

CAA response:

35. In parallel with the proposals for RSA training the CAA will publish an AC to give guidance on how the training is to be conducted. In parallel, the CAA already has, and will continue to, publish educational material via briefings, Vector articles and other means pertinent to RSA.

Annex 1: Summary of specific changes made to proposals made in the Robinson Helicopter Fleet Consultation

Proposal Reference	Change proposed	Reasons
Para 8.a).	No change	
Para 8.b).	No change	
Para 8.c).	No change	
Para 8.d).	'Require Robinson safety awareness training as part of the type rating requirements for the R44.'	In line with SFAR 73 assumptions and training. The inclusion of the R66 will be reviewed when the outcome of the TAIC R66 accident investigation is published.
Para 8.e).	'Require Robinson safety awareness training to be completed by all pilots who hold R44 type ratings and who wish to exercise the privileges of that type rating.'	In line with SFAR 73 assumptions and training. The inclusion of the R66 will be reviewed when the outcome of TAIC R66 investigation is known.
Para 8.f).	'Increase the minimum flight experience for first solo flight in an R22 or R44 from 10 to 20 hours.'	In line with SFAR 73. The inclusion of the R66 will be reviewed when the outcome of the TAIC R66 investigation is known.
Para 8.g).	'Amend the R22 and R44 flight manuals to remove references to Low 'G' flight demonstrations.'	Agreed with submissions that retention of auto-rotation training would be a beneficial element of RSA training.