

P.O. Box 24 Golden Beach Queensland 4551 AUSTRALIA

Fax: +61 (0)74 92 6860

Physical address: Henebery Place - Caloundra Airfield - Qld.

ATTENTION  
CAA R22 TASK FORCE  
Mr B Scott  
Mr H Von Muenchhausen  
Mr T Burns  
Mr K Englesman  
BASI - Mr J Hattley

Gentlemen,

## RE: R22 OPERATIONS - AUSTRALIA

With information filtering back to our industry of the NTSB pressure on the FAA to modify R22 Helicopter ops or design, we know that you will be under pressure to follow suite. I respectfully ask you to consider the following:

1. Flight manual amendments basically mean nothing unless the pilot and operator is educated as to why they should change from what has been the style for the last 15 years. All these new amendments do is to shift responsibility down the chain after foreign events have happened.

You all know, as well as I, that the attitude of the major flight hour operators will be to carry on business as usual with no changes.

**Operators and pilots would require solid reasons for changes to take place effectively.**

2. With the vast majority of R22 flight hours being conducted in remote areas, Australia's climate and the type of operation (musterung) will be greatly effected if area forecast wind/turbulence etc limitations are imposed.

**Economically the country and major companies would suffer - if these climatic conditions were enforced.**

May I suggest that they be "**recommended**" rather than be made mandatory, **or a skill level of 500 hours R22 PIC be the lower limit for industry operations without climatic impositions.**

3. Mandatory retrofitting of governors would be a good idea - however a simple switch turns the governor off.

Most muster pilots do not use the governor.

If governors were to be considered the 500 hr PIC skill level should also be considered i.e.: **pilots below 500 hrs conducting private or charter flights must use a governor. Those pilots below 500 hrs conducting aerial work operations, should have the Chief pilots signature in their log book to certify that they are safe to operate without the governor engaged on the type of specialist operation being performed.**

These options would help the aircraft owners who otherwise would be out of the air for some time having a governor retrofitted at great expense.

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**Experience has shown that properly educated pilots with over 500 PIC in the R22 do not have a high incidence of low RPM problems.**

4. **Flight Training:** As per our previous advice to Keith - we believe that flight training standards are fragmented due to CFI (who is usually the ATO) interpretations.

The Robinson Helicopter factory course, for USA CFI's, has gone a long way to explaining a standard required for a safe training environment in the R22.

**If all instructors were required to complete this or a similar course - future Australian pilots would be starting their career at a higher skill level than previously.**

The American RHC model shows that the pilot accident rate due to low rotor RPM situations, dynamic rollover etc, decreased dramatically.

**With the implementation of this standard, there would be no need to increase R22 training hours in this country as Australia presently has a higher hour training requirement (including instructors) than the USA.**

Should a requirement to increase AB INITIO training hours only in the R22 be forthcoming, many businesses would be extremely disadvantaged economically. There is a feeling in the country that besides the aspect of safety - political pressures on the Robinson Factory and FAA are influenced by competing airframe manufacturers.

5. **Engineering** - Robinson R22 maintenance and 2000 hourly overhauls are currently being conducted by companies where engineers have not attended the RHC factory courses.

Just as the large airline airframe manufacturers require in house maintenance courses - the R22 requires the same (see Robinson maintenance manual).

The problem with distance (travel to the US) prohibits small, financially strapped, organisations from having their engineers trained.

The current lack of apprenticeships has also led to "allied tradesman" conducting work under the coordination of an engineer, for the certificate of approval holder.

**Many of the R22 engineering problems are simply caused by unskilled people.**

E.g.: The lack of knowledge about how to set up the "E" gap in a magneto (she'll be right Jack!), electrolytic corrosion prevention (use of PD washers instead of steel etc), improper bolt torque with wet or dry threads (2 elbow clicks will do mate!), overspeed limits (Joe Bloggs had no problem after overspeeding his machine so you'll be ok).

**RHC should run an engineering course in Australia to update our skills on the aircraft.**

# aeroStar aviation

A.C.N. 010242501

Phone +61 (0)74 91 9190 - Bus  
93 1720 - AH

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6. **Pilot Safety Awareness Courses:** as per our previous correspondence maybe the time is right at present for the CAA or BASI to contract (or such like) us to conduct our recognised R22 Pilot Safety Awareness Course under government auspices. The savings in overseas funds of just one accident would pay for a year of courses!

I repeat that, **our experience has shown that the Awareness Courses have decreased the Australian accident rate by a factor of 80%.**

AAIG, an Insurance Broker, are involved through their head office with the insurance of Qantas and British Airways.

The London office has never heard of such a successful program as ours and heartily endorses it.

May I finish with the invitation that any of you in the R22 team are welcome, as my guest, to attend our next course on Feb 17th, at Cairns, to see for yourself how education works **before imposing restrictions on R22 operations in Australia.** You would be most welcome and I guarantee NO CAA bashing would be encountered.

**We need to work together as a team for a better industry and for Australia.**

Best regards

**Tony Carmody**

20 January 1995