



## **Flitner Ranch**

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RE: NTSB Proposed Rulemaking (NPRM 427)

Mr. Deepak Joshi  
Lead Aerospace Engineer (Structures)  
National Transportation Safety board  
490 L'Enfant Plaza, SW  
Washington, DC 20594

Dear Mr. Joshi:

The following are my comments in opposition to the proposed rulemaking (NPRM) posted in the Federal Register pages 77150-77152 on 27 December 2004 having to do with classifying helicopter blade strikes as "substantial damage" for the purpose of reporting.

I strongly oppose this change for a variety of reasons as a private helicopter operator in Wyoming. First, such a change violates the spirit of Executive order 12866 relative to the "consequences" of such regulation and its' benefit to society. Furthermore, such onerous regulation change would have an adverse effect on small business in the United States with little or no benefit to the public.

In the event of a blade strike and the subsequent time involved to wait for a NTSB inspection, valuable time would be lost to the helicopter owner and his/her operation, thus adversely effecting the business enterprise.

Undoubtedly, insurance rates would rise as the result of all the burdensome regulation and records that would be generated by the government.

As to the NTSB capability to investigate accidents, the record indicates that the NTSB has only been able to make a thorough investigation in over 82% of all helicopter accidents noted during a recent study. It is apparent that such a regulation would further tax limited NTSB resources and lead to additional expense to the agency and expensive delays for the owner operator of helicopters.

The wait between a rotor blade strike and the subsequent "accident" investigation would obviously be especially onerous to both the NTSB and the potentially financially deadly helicopter operator. This is especially negative to operators at a time when the helicopter industry is struggling under high fuel and insurance costs prevalent in the current environment.

In summary, we strongly oppose this proposed regulation.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Flitner", with a long horizontal line extending to the right.

David A. Flitner  
Owner  
Flitner Ranch/Pied Piper Inc.