



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave
Washington, DC 20591

October 20, 2021

Exemption No. 18928
Regulatory Docket No. FAA-2021-0061

Mr. Brian H. Beattie
Vice-President, Director of Operations
Croman Corporation
801 Avenue C
White City, Oregon 97503

Dear Mr. Beattie:

This letter is to inform you that the Federal Aviation Administration (FAA) has granted your request for an exemption. This letter transmits the FAA's decision, explains the FAA's basis, and provides the conditions and limitations of the exemption, including the date it ends.

The Basis for the FAA's Decision

By letter dated January 21, 2021, you petitioned the FAA on behalf of Croman Corporation (Croman) for an exemption from § 43.3(i) of Title 14, Code of Federal Regulations (14 CFR). After the review of your request, the FAA has determined the petitioner requires an exemption § 43.3(a) of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Croman's pilots to remove and install cabin/cockpit doors on company-owned and operated Bell Helicopter Textron (BHT) 206 Series, H3WE helicopters using Certified Technology's Supplemental Type Certificate (STC) SR00532SE.

The FAA has issued a grant of exemption in circumstances similar in material respects to those presented in your petition. In Grant of Exemption No. 18052 (copy enclosed), the FAA found that because § 43.3(i) is permissive only and does not address the relief sought by the petitioner, the FAA has determined that Croman needs relief from § 43.3(a), which provides, in pertinent part:

Except as provided in this section and § 43.17, no person may maintain, rebuild, alter, or perform preventive maintenance on an aircraft, airframe, aircraft engine, propeller, appliance, or component part to which this part applies.

The FAA determined that the removal and reinstallation of Croman's Bell 206B aircraft doors in accordance with STC SR00532SE by appropriately trained and employed Croman pilots results in an equivalent level of safety as if a 14 CFR part 65 certificated mechanic performed the same

AFS-22-00144-E

function. The FAA emphasizes that this exemption does not apply to any other doors that do not have the modification installed and documented in the aircraft records.

Having reviewed your reasons for requesting an exemption, I find that:

- They are similar in all material respects to relief previously requested in the enclosed Grant of Exemption No. 18052;
- The reasons stated by the FAA for granting the enclosed Grant of Exemption No. 18052 also apply to the situation presented in your petition; and
- A grant of exemption is in the public interest.

The FAA's Decision

The FAA has determined that good cause exists for not publishing a summary of the petition in the *Federal Register*. The FAA has determined that good cause exists because the requested exemption would not set a precedent and any delay in acting on this petition would be detrimental to Croman.

Under the authority contained in 49 U.S.C. §§ 106(f), 40113, 44701 and 44807, an exemption from 14 CFR § 43.3(a) to the extent necessary to allow Croman's pilots to remove and install aircraft doors on company-owned BHT 206B helicopters listed on Croman's Operations Specifications using Certified Technology's STC SR00532SE subject to the conditions and limitations described below.

Conditions and Limitations

1. This exemption applies only to those Croman Bell 206B helicopters that have the quick release pin and hinge assembly, using Certified Technology's Supplemental Type Certificate (STC SR00532SE), installed on the helicopter.
2. Before Croman exercises the privileges of this exemption, it must obtain FAA approval of the training that it must add to its FAA-approved training manual pertaining to its pilots removing and reinstalling doors on its Bell 206B helicopters following the instructions in STC SR00532SE.
3. Croman must conduct annual training for each of its pilots that operate the Bell 206B helicopters. Croman must document this training in each trained pilot's training record, and the training must be conducted by a certificated mechanic. This training must include the following topics:
 - a. Proper technique of the door hinge pin(s) insertion/extraction and door(s) removal/installation.

- b. Proper stowage of the removed door(s).
 - c. Corrected weight and balance computation.
 - d. Appropriate maintenance logbook entry.
 - e. Review applicable sections of the Rotorcraft Flight Manual (RFM) limitations in reference to doors off/removed operations.
 - f. Review of the airworthiness criteria in the Instructions for Continued Airworthiness (ICA) section of STC SR00532SE.
4. Croman's trained pilots removing and reinstalling doors on the company's Bell 206B helicopters under this exemption must use and follow the instructions in STC SR00532SE, and must make an appropriate maintenance record entry each time this function is performed, as required by §§ 43.5 and 43.9.
 5. This exemption is not valid for operations outside of the United States of America.
 6. Before conducting doors-off or doors-removed operations, Croman must provide a copy of this grant of exemption to its responsible Flight Standards District Office.

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

The Effect of the FAA's Decision

This exemption terminates on November 30, 2023, unless sooner superseded or rescinded.

To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2021-0061 (<http://www.regulations.gov>). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Sincerely,

/s/

Robert C. Carty

Acting Executive Director, Flight Standards Service

Enclosure

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, DC 20591

In the matter of the petition of

Croman Corporation

For an exemption from § 43.3(i)
of Title 14, Code of Federal
Regulations

Exemption No. **18052**

Regulatory Docket No. **FAA-2017-0789**

GRANT OF EXEMPTION

By letter dated August 2, 2017, Mr. Bud Kaufman, President, Croman Corporation (Croman), 801 Avenue C, White City, OR 97503 petitioned the Federal Aviation Administration (FAA) on behalf of Croman for an exemption from § 43.3(i) of Title 14, Code of Federal Regulations (14 CFR). After the review of your request, the FAA has determined the petitioner needs an exemption from 14 CFR § 43.3(a) to the extent necessary to allow Croman's pilots to remove and install cabin/cockpit doors on company-owned and operated Bell Helicopter Textron (BHT) 206 Series, H3WE helicopters using Certified Technology's Supplemental Type Certificate (STC) SR00532SE.

The petitioner requests relief from the following regulation:

Section 43.3(i) prescribes, in pertinent part, that, excluding holders of a sport pilot certificate, in accordance with an approval issued to the holder of a certificate issued under part 135 of this chapter, a pilot of an aircraft type-certificated for 9 or fewer passenger seats, excluding any pilot seat, may perform the removal and reinstallation of approved aircraft cabin seats, approved cabin-mounted stretchers, and when no tools are required, approved cabin-mounted medical oxygen bottles, provided, the pilot has satisfactorily completed an approved training program and is authorized in writing by the certificate holder to perform each task; and the certificate holder has written procedures available to the pilot to evaluate the accomplishment of the task.

Because § 43.3(i) is permissive only and does not address the relief sought by the petitioner, the FAA has determined that Croman needs relief from § 43.3(a), which provides, in pertinent part:

Except as provided in this section and § 43.17, no person may maintain, rebuild, alter, or perform preventive maintenance on an aircraft, airframe, aircraft engine, propeller, appliance, or component part to which this part applies.

The FAA also notes that, in view of the maintenance record entry requirements of §§ 43.5 and 43.9, for purposes of this exemption petitioner needs relief from § 43.7(a), which, in pertinent part, provides:

Except as provided in this section and § 43.17, no person, other than the Administrator, may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service after it has undergone maintenance, preventive maintenance, rebuilding, or alteration.

In neither § 43.3 nor § 43.7 are pilots operating aircraft under part 135 listed as an exception to the general prohibition of performing maintenance, preventive maintenance, rebuilding or alteration, or of approving the work for return to service.

The petitioner supports its request with the following information:

Croman states that, because of the nature of the flights operated, it needs flexibility to be able to remove or reinstall doors while out in the field and away from the home base where its mechanics are located. Croman further states that it is not feasible to travel with a mechanic on board the aircraft at all times when door removal might be required. Helicopters are weight-sensitive and having to travel with a mechanic to remove or reinstall the doors would be a disadvantage to Croman's operation.

In its petition, Croman states that it believes the removal and installation of helicopter doors is the type of action that “falls under the same classifications and complexity as the preventive maintenance items as listed in 14 CFR 43 Appendix A (c)” Croman analogizes its situation to that contemplated by § 43.3(i) (the regulation from which it seeks relief), which addresses removal and reinstallation of cabin seats and stretchers when no tools are required, and also cabin-mounted medical oxygen bottles, but does not include doors.

Croman states, by using Certified Technology's STC SR00532SE, which is a quick release pin and hinge assembly for the helicopter doors, that the quick release pins replace the Original Equipment Manufacturer's hinge assembly, and simplifies the door removal and/or installation process. Croman states that it has a written training module on the removal and installation of its helicopter doors utilizing the Certified Technology STC door pins—this training will be included in its FAA-approved part 135 training manual. Each of its pilots who operate the Bell 206B helicopters will be trained annually and have the training

documented in the pilot's training folder. Croman maintains that this provides a level of safety not only equal to, but greater than that provided by the rule from which it seeks exemption.

The FAA's analysis is as follows:

The FAA published a summary of the petition in the Federal Register on April 25, 2018 (83 FR 18118). We received one comment. The commenter stated that Croman's pilots should have the ability to remove and install the cabin/cockpit doors on Bell 206B helicopters if they are properly trained. However, if the pilots are not trained, a risk of the doors departing the aircraft during flight can damage the tail and/or main rotor system. Such a loss has a potential for catastrophic failures that can harm and kill the occupants in the aircraft and persons on the ground.

The commenter's scenario provides a good example of the hazards that may occur if Croman's pilots are not properly trained in the methods of removing and reinstalling the aircraft doors. The FAA did consider this scenario during our analysis, and, in the Condition and Limitation section of this exemption, the FAA is requiring the following:

“Croman must conduct annual training for each of its pilots that operate the Bell 206B helicopters. Croman must document this training in each trained pilot's training record, and the training must be conducted by a certificated mechanic.”

The FAA understands the need for Croman to remove and reinstall doors. The FAA also understands the numerous types of missions that Croman can conduct, including, but not limited to: Fire Fighting Operations, Search and Rescue, Power and Pipe Line Patrols/Survey, Arial Photography, Filming, External Load Operations, and Surveying and/or Mapping.

The FAA agrees with Croman that the process of removal and installation of its helicopter doors under the Certified Technology STC (using a quick release pin and hinge assembly, when no tools are required) is analogous in terms of mechanical complexity and sophistication to the removal and reinstallation of cabin seats and stretchers when no tools are required that is allowed by § 43.3(i).

The FAA has determined that the removal and reinstallation of Croman's Bell 206B aircraft doors in accordance with STC SR00532SE by appropriately trained and employed Croman pilots results in an equivalent level of safety as if a 14 CFR part 65 certificated mechanic performed the same function. The FAA emphasizes that this exemption does not apply to any other doors that do not have the modification installed and documented in the aircraft records.

While the process of removing and reinstalling helicopter doors in the manner described in this exemption (quick release pin and hinge assembly under STC SR00532SE) is not explicitly identified in Appendix A of part 43, the FAA agrees that this activity is akin to removing and replacing cabin seats and stretchers when no tools are required. Considering

the information provided and the installation of STC SR00532SE, the FAA has determined that an exemption from § 43.3(a) is appropriate in Croman's circumstance.

The FAA's Decision:

In consideration of the foregoing, I find that a grant of exemption is in the public interest. Therefore, pursuant to the authority contained in 49 U.S.C. §§ 106(f), 40113, and 44701 delegated to me by the Administrator, I hereby grant Croman Corporation (Croman) an exemption from 14 CFR §§ 43.3(a) and 43.7(a) to the extent necessary to allow Croman's pilots to remove and install aircraft doors on company-owned BHT 206B helicopters listed on Croman's Operations Specifications using Certified Technology's STC SR00532SE. This grant is subject to the conditions and limitations described below.

Conditions and Limitations:

1. This exemption applies only to those Croman Bell 206B helicopters that have the quick release pin and hinge assembly, using Certified Technology's Supplemental Type Certificate (STC SR00532SE), installed on the helicopter.
2. Before Croman exercises the privileges of this exemption, it must obtain FAA approval of the training that it must add to its FAA-approved training manual pertaining to its pilots removing and reinstalling doors on its Bell 206B helicopters following the instructions in STC SR00532SE.
3. Croman must conduct annual training for each of its pilots that operate the Bell 206B helicopters. Croman must document this training in each trained pilot's training record, and the training must be conducted by a certificated mechanic. This training must include the following topics:
 - a. Proper technique of the door hinge pin(s) insertion/extraction and door(s) removal/installation.
 - b. Proper stowage of the removed door(s).
 - c. Corrected weight and balance computation.
 - d. Appropriate maintenance logbook entry.
 - e. Review applicable sections of the Rotorcraft Flight Manual (RFM) limitations in reference to doors off/removed operations.
 - f. Review of the airworthiness criteria in the Instructions for Continued Airworthiness (ICA) section of STC SR00532SE.

4. Croman's trained pilots removing and reinstalling doors on the company's Bell 206B helicopters under this exemption must use and follow the instructions in STC SR00532SE, and must make an appropriate maintenance record entry each time this function is performed, as required by §§ 43.5 and 43.9.
5. This exemption is not valid for operations outside of the United States of America.
6. Before conducting doors-off or doors-removed operations, Croman must provide a copy of this grant of exemption to its responsible Flight Standards District Office.

This exemption terminates on November 30, 2020, unless sooner superseded or rescinded.

Issued in Washington, D.C., on November 7, 2018.

/s/

Rick Domingo

Executive Director, Flight Standards Service