AirCam
National Helicopter Services, Inc.

U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor Room W12-140
New Jersey Avenue SE
Washington, DC 20590

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Under AD 2021-23-13: Docket No. FAA-2021-0954, Project Identifier AD-2021-01170-R How would the requirements of FAR 135.160 for Radar Altimeters apply?

On April 4, 2017, FAR Part 135.160 was published that required all helicopters with Operations Specifications authorizing Part 135 operations to install Radar Altimeters unless a deviation for it was approved. The industry went to great cost to comply. The Radar Altimeters were required to be installed in advanced cockpits as well as in simple analog systems. This installation had nothing to do with landing systems, auto hover technology, or operating performance. This requirement was to aid in the prevention of mishaps associated with inadvertent Instrument meteorological conditions (IIMC). The high numbers of IIMC were due in part because the Aeromedical Air Ambulance industry had adopted a very steep slow hover down procedure to help mitigate rotor strikes with objects attached to the ground, and Settling with Power situations. As a result of this adoptive procedure many helicopters were going inadvertent IMC due to the developing cloud of dirt, dust, debris, and snow below the slowly descending helicopters in those associated environments. There were a few IIMC mishaps that were attributed to the attempt to remain VMC after entering IMC, but for the most part most mishaps occurred close to the ground.

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These mishaps happened in all geographical areas. The FAA, to protect the flying public, determined that Radar Altimeters would help prevent impact with the ground under the above conditions. Since these conditions could occur anywhere geographically, it would make sense that some of those environments may be in the vicinity of the proposed 5G or C-band areas. The mitigation measure here is to issue a Notam in association with the above AD to prevent helicopters from flying into those environments. How will Part 135.160 be applied in those environments outlined above? Will there be relief from Part 135.160?

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