

ASSOCIATION OF AIR MEDICAL SERVICES

February 12, 2014



The Honorable Anthony Foxx
Secretary, U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

RE: FAA Rule on Air Ambulance Safety

Dear Secretary Foxx:

On October 12, 2010, the Federal Aviation Administration (FAA) issued a notice of proposed rulemaking (NPRM) on “Air Ambulance and Commercial Helicopter Operations, Part 91 Helicopter Operations, and Part 135 Aircraft Operations; Safety Initiatives and Miscellaneous Amendments.” As summarized by FAA, the proposed rule included provisions that mandated air medical operators:

- “Equip with Helicopter Terrain Awareness and Warning Systems (HTAWS)”;
- “Conduct operations under Part 135, including flight crew time limitation and rest requirements, when medical personnel are on board”;
- “Establish operations control centers if they are certificate holders with 10 or more helicopter air ambulances”;
- “Institute pre-flight risk-analysis programs”; and
- “Ensure their pilots in command hold an instrument rating.”

The comment period on the proposed rule closed on January 10, 2011.

In 2012 Congress, in the “FAA Modernization and Reform Act” (P.L. 112-95), required that “[n]ot later than June 1, 2012, the Administrator shall issue a final rule, with respect to the notice of proposed rulemaking” on air ambulance safety.

Industry related organizations supported the FAA’s notice of proposed rulemaking and submitted comments, which not only expressed that support, but also called for additional safety enhancements.

In the three years since the comment period on the NPRM closed, the industry has moved forward to implement the requirements that we anticipate will be included in the final rule. Those efforts entailed significant fleet-wide investments in safety technology. We, the Joint National EMS Leadership Forum, strongly support the prompt completion and publication of the final version of the rule, which is an essential next step in advancing the safety of air medical operations.

(All Signatories and Logos here)

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