

Factual Report – Addendum 4
PMI Email Questions

OPERATIONAL FACTORS

ERA18MA099

From: Torgerson, Anne (FAA) [REDACTED]
Sent: Thursday, August 1, 2019 9:33 AM
To: Lawrence David <[REDACTED]>
Cc: Hempen, Patrick (FAA) <[REDACTED]> Rigsby, Matthew (FAA)
[REDACTED]
Subject: NTSB Request 19-144

Hi Capt. Lawrence,

This is in response to NTSB Request 19-144, Liberty Helicopters. Please see response below.

Event: Liberty Helicopters, New York, March 11, 2018

In response to the NTSB's questions for the Liberty Principal Maintenance Inspector (PMI) assigned to the Liberty Helicopters Part 135 operating certificate (MHIA082G) at the time of the accident (March 11, 2018), the answers are as follows:

- 1. According to your previous NTSB interview, during your surveillance activity on October 31, 2017 at Liberty Helicopters you indicated that you observed Liberty Helicopters aircraft operating doors-open flights with passengers harnessed and tethered to the aircraft. At any time during that visit did you actually inspect a Liberty helicopter (either N350LH or any AS350 B2 model helicopter) as part of your surveillance activities? Explain.*

Answer: No. Ramp inspections were not part of the planned surveillance activities for that day.

- 2. Did you inspect the rear seat belt attachment points (either N350LH or any AS350 B2 model helicopter) and recall where they were attached? Explain.*

Answer: No. SEE ANSWER TO QUESTION 1.

- 3. Are you familiar with where the rear seat belts are required to be anchored (either on N350LH or any AS350 B2 model helicopter)? Explain.*

Answer: Yes. The rear seat belt attachment points on an AS-350-B2 are located along the rear passenger seat frame floor. They are to be anchored to the seat belt attach points as indicated in Airbus SOS 25-20-00, 01.

4. *Are the seat belt attach points included as part of any FAA work plan surveillance activity? Explain how or why not?*

Answer: I am not aware of any specific FAA surveillance activity dedicated to the inspection of seat belt attach points. An in-depth inspection of that nature is the responsibility of the operator in accordance with the manufacturers recommended maintenance program.

5. *Do you know whether Liberty changed the configuration of where the rear seat belts attached when changing operation type (Part 91, Part 135), on either N350LH or any AS350 B2 model helicopter? Explain.*

Answer: No.

6. *At anytime following your visit to Liberty on October 31, 2017, did you communicate with Liberty or NYON Air indicating FAA approval of any of the following:*

- a. *The use of seat belts attached to the floor mounts,*

Answer: No. Airbus SOS 25-20-00, 01 states the floor anchor points are to be used to attach the seat belts.

- b. *Use of a tether and harness system observed on October 31, 2017 for passengers in Liberty aircraft.*

Answer: There is no regulatory requirement for FAA approval. Approval was never requested or granted. The harness system was a temporary installation.

- c. *The operation (in general) for the observed doors-open operations conducted by either Liberty or NYON Air.*

Answer: No. Doors off operations are not contrary to any regulations.

7. *Are you aware of any additional work done by either the FAA or Liberty helicopters regarding the operation and activation of the emergency float systems following the July 7, 2007 ditching of a Liberty Helicopters EC 130 B4 (NTSB Case #MIA07FA J 16)? Explain.*

Answer: No. I was not the principal maintenance inspector of Liberty Helicopters at that time and was not involved in that investigation.

Have a great day.

Anne

Anne Torgerson
Aviation Safety

Accident Investigation, AVP-100
FAA
800 Independence Ave., SW
Washington, DC 20591
[REDACTED]