

From: [Baker Daniel](#)
To: [David Gofman](#)
Bcc: [Crookshanks Clinton](#)
Subject: RE: NTSB Accident/Incident Form - N6150V, Lodi, CA
Date: Wednesday, September 7, 2022 3:47:00 PM
Attachments: [image001.png](#)

Good afternoon Mr. Gofman,

I have researched our data base and our guidance and concur with the previous assessment that the damage to N6150V is substantial. According to 49 CFR 830.2 Substantial damage means damage or failure which adversely affects the structural strength, performance, or flight characteristics of the aircraft, and which would normally require major repair or replacement of the affected component.

The hole in the bottom of the airplane is in the keel. The keel is considered a primary structural element of an amphibious airplane such as a Lake L4, and a hole in the keel will adversely affect its structural strength.

According to Title 14 *CFR* § 1.1

Major repair is defined as a repair: (1) That, if improperly done, might appreciably affect weight, balance, **structural strength**, performance, powerplant operation, flight characteristics, or **other qualities affecting airworthiness**; or (2) That is not done according to accepted practices or cannot be done by elementary operations. Please note that for the purposes of making an accident determination there is no requirement for a 337 to have been required or for any dollar amount of damage to have occurred.

There is a previous accident in our database (WPR17LA165) that involved a Lake LA-4 that resulted from a landing gear collapse. The airplane suffered abrasion damage to the keel that also resulted in substantial damage.

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