



A bold voice for transportation workers

January 10, 2011

The Honorable J. Randolph Babbitt
Administrator
Federal Aviation Administration
(Attention: Docket Operations, M-30)
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Rm W-12-140
West Building Ground Floor
Washington, DC 20590-0001

Re: Docket No. FAA-2010-0982: 14 CFR Parts 1, 91, 120, and 135 Air Ambulance and Commercial Helicopter Operations, Part 91 Helicopter Operations, and Part 135 Aircraft Operations; Safety Initiatives and Miscellaneous Amendments; Proposed Rule

Dear Administrator Babbitt:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to write in support of the notice of proposed rulemaking (NPRM) for Air Ambulance and Commercial Helicopter operations referenced above. Specifically, we endorse the comments submitted by our affiliate the Office and Professional Employees International Union (OPEIU), which represents 4,000 helicopter pilots in the U.S. and Canada, 1,300 of whom are emergency medical services (HEMS) pilots.

TTD has long supported efforts to strengthen the safety of helicopter flight operations and has been actively engaged in pushing for the passage of legislation and implementation of regulations that would address the dramatic increase in fatal HEMS accidents over the last several years. These accidents have cast a light on the need to implement more stringent regulations in this critical industry.

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Edward Wytkind, President / Larry I. Willis, Secretary-Treasurer



As detailed in OPEIU's comments, several provisions in the NPRM can be improved to further strengthen air ambulance operations. We hope the FAA will take into account the expertise and experience of the thousands of helicopter pilots represented by OPEIU. Their recommendations will enhance operational procedures, equipment requirements, and training to help ensure the highest level of safety for helicopter pilots, medical crews and patients.

Again, we thank the FAA for offering this proposed rulemaking and look forward to the implementation of regulations that will enhance aviation safety in the HEMS industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a large, stylized flourish at the end.

Edward Wytkind
President