Helicopter Association International

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Dedicated to the Advancement of the International Helicopter Community

October 26, 2015

Mr. Paul Gallant,
U.S. Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue SE
West Building Ground Floor
Room W12-140
Washington, DC 20590-0001

Re: FAA Docket No. FAA-2015-2776 and Airspace Docket No. 15-AEA-5, *Notice of Proposed Rulemaking for Proposed Amendment and Establishment of Restricted Areas: Chincoteague Inlet, VA*

Dear Mr. Gallant,

I am writing on the behalf of the Helicopter Association International (HAI), a not-for-profit, professional trade association that represents the interests of the helicopter community. HAI has over 4,000 members, including 1,727 companies in 74 nations. For over 60 years, HAI has provided its members with services that directly benefit their operations by offering programs to enhance safety, encourage professionalism, and promote the unique benefits of vertical flight. HAI's first priority is – and always will be – safety.

HAI submits the following in response to the request for comments for the referenced Notice of Proposed Rulemaking related to airspace surrounding the NASA Wallops Flight Facility. HAI applauds NASA's efforts to maintain separation between test aircraft and the general aviation (GA) community and we commend NASA Wallops Flight Facility for its long history of responsible airspace management. However, we are unable to support the proposed changes as presented. We believe there are safety issues that require additional analysis and risk mitigation before any restricted airspace expansion.

HAI agrees with the concerns and supports recommendations presented by AOPA in their letter dated September 16, 2015. Expansion of airspace as described in the NPRM will impact both IFR and VFR aircraft. As proposed, this expansion of restricted airspace would require helicopter operators to either fly further offshore for longer periods to circumnavigate restricted airspace, or to fly further west into a more tightly congested corridor. In this respect, the offshore environment is of particular concern, especially during winter months when lower sea temperatures greatly reduce aircrew survivability times, should a mishap result in water entry. Additionally, increased minimum altitudes proposed for R-6604 D and E could force helicopter operators higher and subject them to increased encounters with icing conditions.

I therefore urge the FAA to withhold approval of this proposed expansion of restricted airspace until such time that further analysis can be conducted to enable a complete understanding of the risks and impacts to the general aviation community.

Sincerely,

Matthew S. Zuccaro
President & CEO of Helicopter Association International