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December 12, 2012

Martin Eley, Director General, Civil Aviation
Transport Canada
330 Sparks Street
Ottawa, Ontario K1A 0N5
Canada

Dear Mr. Eley:

At the end of January 2013 the Blade Torque event exemption (RDIMS #7212505) for MD 500 main rotor blades will expire, and we are led to believe that Transport Canada may not re-issue it. A number of our members have contacted HAC to express their grave concerns over the potential that the exemption will not be renewed.

The current exemption requires that a torque event inspection be carried out every 35 hours or 200 torque events after accumulating 750 flight hours and 13,750 torque events. If the current exemption, which allows trained, unlicensed maintenance technicians and flight crews to perform the inspection tasks without a maintenance release is allowed to expire, it will be necessary to have an AME stationed with every MD 500, solely for the purpose of this inspection – or replace the blades at considerable expense.

We do understand that the terms of the exemption require the use of a magnifying glass, which is an exceptional practice for elementary maintenance tasks however, we are unaware of any problems that have occurred as a result of this practice since 2007 when it was first authorized. We are aware of a Risk Assessment conducted on this exemption.

We are also aware that there is historical data that has now been provided by one operator showing that numerous sets of the HTC M/R Blades have reached their prescribed time life without any cracking issues.

We are aware that a number of our operator-members would be affected adversely if the exemption were not to be issued however, we are led to believe that operators are required to notify Transport Canada if they are using the exemption. Is Transport Canada in a position to comment on the number of affected aircraft in the Canadian fleet?

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We are concerned that if the exemption is not re-issued that this will impose a significant hardship on the operators of MD 500 aircraft, when there is a procedure that offers an equivalent level of safety. In light of the exceptional costs that would be associated with the termination of the exemption, and the largely successful use of trained pilots and technicians, we are appealing to you to authorize the re-issuance of the exemption and to consider authorizing an AMOC for AD2005-21-02 and broaden it to include the Torque Event inspection requirement stipulated in the Helicopter Technology Corporation Maintenance Manual HTCM-001 which refers to the MD Helicopters, Inc. CSP-HMI-2 Manual, Section 04-00-00. These manuals encompass the same requirement as the AD, but cover the higher dash # M/R Blades manufactured after the AD's issue date.

HAC would be pleased to meet with you or your staff to discuss this important and time-critical issue.

Sincerely,

Fred L. Jones BA LLB
President & CEO