

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.437

National Policy

Effective Date:
9/22/17

Cancellation Date:
9/22/18

SUBJ: Part 135 Helicopter Training and Qualification Program Review and Competency Check Requirements

1. Purpose of This Notice. This notice directs principal operations inspectors (POI) to conduct a focused program review of Title 14 of the Code of Federal Regulations (14 CFR) part 135 approved helicopter training and qualification programs.

2. Audience. The primary audience for this notice are POIs responsible for the approval and surveillance of part 135 helicopter training and qualification programs and aviation safety inspectors (ASI) who conduct part 135, § 135.293(a) helicopter written or oral tests or § 135.293(b) helicopter competency checks. The secondary audience includes Flight Standards Service (AFS) personnel in certificate-holding district offices (CHDO), branches, and divisions in the regions and Headquarters (HQ).

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices. ASIs can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Air carriers and operators can find this notice on the Federal Aviation Administration's (FAA) website at <http://fsims.faa.gov>. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. The objective of the program review is to identify and correct part 135 helicopter training and qualification programs that do not include the required training and checking on (1) procedures for helicopter handling in flat-light, whiteout, and brownout conditions and (2) recovery from inadvertent instrument meteorological conditions (IIMC). In addition, this notice provides guidance to ASIs conducting § 135.293(a) helicopter written or oral tests or § 135.293(b) helicopter competency checks.

a. Accidents History. From 1991 to 2010, there were 49 accidents, involving 63 fatalities, which occurred while a helicopter was operating under visual flight rules (VFR). The FAA determined that these accidents may have been prevented if the pilots were better prepared to cope with encounters with IIMC, flat-light, whiteout, and brownout conditions.

b. Notice of Proposed Rulemaking (NPRM). On October 12, 2010, the FAA issued the Air Ambulance and Commercial Helicopter Operations, Part 91 Helicopter Operations, and Part 135 Aircraft Operations: Safety Initiatives and Miscellaneous Amendments NPRM which

included (1) a proposal for testing a pilot's knowledge of procedures for aircraft handling in flat-light, whiteout, and brownout conditions during § 135.293(a) helicopter written or oral tests and (2) a proposal for checking on recovery from IIMC during § 135.293(b) helicopter competency checks. In the NPRM, the FAA explained that this proposal would require that the demonstration be scenario-based and include attitude instrument flying, recovery from unusual attitudes, navigation, air traffic control (ATC) communications, and at least one instrument approach. In the NPRM, the FAA further stated that: "If the aircraft is appropriately equipped and the check is conducted at a location where an ILS is operational, the pilot should demonstrate an ILS approach. If the pilot is unable to conduct an ILS approach, he or she should demonstrate a GPS approach if the aircraft is equipped to do so and the pilot is properly trained. If neither an ILS nor GPS approach can be performed, the pilot should perform another instrument approach."

c. Final Rule. On February 21, 2014, the FAA published the Helicopter Air Ambulance, Commercial Helicopter, and Part 91 Helicopter Operations Final Rule. The proposals for testing a pilot's knowledge of procedures for aircraft handling in flat-light, whiteout, and brownout conditions and checking on recovery from IIMC were adopted as proposed.

d. Compliance Date. In accordance with § 135.293(h), after April 22, 2015, § 135.293(a) helicopter written or oral tests must include testing of a pilot's knowledge of procedures for aircraft handling in flat-light, whiteout, and brownout conditions, including methods for recognizing and avoiding those conditions. In accordance with § 135.293(c) and (h), after April 22, 2015, § 135.293(b) helicopter competency checks must include a demonstration of the pilot's ability to maneuver the helicopter solely by reference to instruments. The check must determine the pilot's ability to safely maneuver the helicopter into visual meteorological conditions following IIMC. For competency checks in helicopters that are not certified for instrument flight rules (IFR), the pilot must perform such maneuvers as appropriate to the helicopter's installed equipment, the certificate holder's operations specifications (OpSpecs), and the operating environment.

5. Checking Standards for Recovery from IIMC. Recovery from IIMC is an emergency maneuver since the pilot would be operating under VFR prior to the IIMC. The recovery from IIMC must include attitude instrument flying, recovery from unusual attitudes, navigation, ATC communications, and at least one instrument approach, if the helicopter is appropriately equipped. The instrument approach may be any approach available in the area. Section 135.293(e) requires that to demonstrate competent performance, the pilot must be the obvious master of the aircraft with the successful outcome of the maneuver never in doubt.

a. Pilots Authorized to Conduct Part 135 Helicopter Operations Under IFR. For pilots who are authorized to conduct part 135 helicopter operations under IFR, ASIs and check pilots should use the same standards that the air carrier/operator uses to evaluate other instrument maneuvers and procedures to determine if the pilot has met the standard required by § 135.293(e). If the helicopter is equipped with an operable autopilot and the pilot is trained in its use, the autopilot may be used in the accomplishment of this task.

b. Pilots Not Authorized to Conduct Part 135 Helicopter Operations Under IFR. For pilots not authorized to conduct part 135 helicopter operations under IFR, ASIs and check pilots

should use the standards that the air carrier/operator uses to evaluate emergency maneuvers and procedures to determine if the pilot has met the standard required by § 135.293(e). If the helicopter is equipped with an operable autopilot and the pilot is trained in its use, the autopilot may be used in the accomplishment of this task.

c. Part 135 Operations Limited to Day VFR. If a part 135 helicopter air carrier/operator's OpSpec A003, Aircraft Authorization, only authorizes day VFR operations for a specific make and model helicopter that is not equipped with attitude reference instrumentation, the requirement for recovery from IIMC may not be applicable. However, if the air carrier/operator operates multiple variations of the same make and model helicopter—some with attitude reference instrumentation and some without attitude reference instrumentation—pilots must be checked in the variation in which they will serve. For example, if a pilot will only serve in the variation without attitude reference instrumentation, the requirement for recovery from IIMC is not applicable. However, if a pilot will serve in both variations, then the requirement for recovery from IIMC must be completed in the variation with attitude reference instrumentation.

6. Action.

a. POIs. Within 60 days of the effective date of this notice, POIs must conduct a focused review of the helicopter training and qualification programs for their assigned certificate holders to identify whether the programs include the required training and testing on procedures for aircraft handling in flat-light, whiteout, and brownout conditions and training and checking on recovery from IIMC.

(1) Required Training, Testing, and Checking Not Included. If the program does not include the required training, testing, and checking, the POI must notify the certificate holder in writing that a revision to the training and qualification program is required in accordance with § 135.325(b) or (d), as applicable. This notification must state that the certificate holder must submit a revision to the training and qualification program within 30 calendar-days of notification from the POI, to include the required training, testing, and checking. The POI should follow the approval process in FAA Order 8900.1, Volume 3, Chapter 19, Section 2, Safety Assurance System: Training Approval Process, to approve revisions to the certificate holder's training and qualification program.

(2) Required Training, Testing, and Checking Included. If the program already includes the required training, testing, and checking, no further action is required.

b. ASIs Conducting § 135.293(a) Helicopter Written or Oral Tests. ASIs conducting § 135.293(a) helicopter written or oral tests must follow the policy in this notice and Order 8900.1, Volume 3, Chapter 19, Section 7, Safety Assurance System: Flightcrew Qualification Curriculum Segments, when testing the pilot's knowledge of procedures for aircraft maneuvering in flat-light, whiteout, and brownout conditions, including methods for recognizing and avoiding those conditions. Information regarding flat-light and whiteout conditions is available in Chapter 7 of the Aeronautical Information Manual.

c. ASIs Conducting § 135.293(b) Helicopter Competency Checks. ASIs conducting § 135.293(b) helicopter competency checks must follow the policy in this notice and

Order 8900.1, Volume 3, Chapter 19, Section 7 when checking the recovery from IIMC maneuver.

7. Additional Information. Additional information regarding the content of the training and qualification curricula to meet the recovery from IIMC requirement is available in the following sections of Order 8900.1, Volume 3, Chapter 19:

- Section 6, Safety Assurance System: Flight Training Curriculum Segments.
- Section 7.
- Section 15, Safety Assurance System: Air Ambulance Specific Flight Crewmember Training Programs.

8. Disposition. We will incorporate the information in this notice into Order 8900.1 before this notice expires. Direct questions or comments concerning this notice to the Air Transportation Division (AFS-200) at 202-267-8166.



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