



**U.S. Department  
of Transportation  
Federal Aviation  
Administration**

# SAFO

Safety Alert for Operators

SAFO 18013  
DATE: 10/23/18

Flight Standards Service  
Washington, DC

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*A SAFO contains important safety information and may include recommended action. SAFO content should be especially valuable to air carriers in meeting their statutory duty to provide service with the highest possible degree of safety in the public interest. Besides the specific action recommended in a SAFO, an alternative action may be as effective in addressing the safety issue named in the SAFO.*

**Subject:** Updated Rotorcraft External Load Attaching Means and Quick Release Devices for Human External Cargo (HEC).

**Purpose:** This SAFO serves to alert Title 14 of the Code of Federal Regulations (14 CFR) Part 133 rotorcraft operators of the possibility that they are conducting HEC operations with attaching means that do not meet HEC certification requirements. This SAFO provides updated guidance for the applicability of part 133 as it relates to public aircraft operations (PAO) and supersedes the information conveyed in canceled SAFO 18004, Rotorcraft External Load Attaching Means and Quick Release Devices for HEC, effective of April 23, 2018.

**Background:** The Federal Aviation Administration (FAA) recently became aware of non-HEC certified external cargo hook kits being utilized in part 133 Class B rotorcraft load combination operations to carry persons. These cargo hook kits are not associated with any specific manufacturers or aircraft make/model. Attaching means (e.g., cargo hooks) that are approved for external occupants must be documented in the Supplemental Type Certificate (STC) and/or Rotorcraft Flight Manual Supplement (RFMS) to indicate that those attaching means meet 14 CFR parts 27 or 29 certification requirements for HEC. The STC and/or RFMS may state the attaching means are approved for non-human external cargo only, or the attaching means do not meet the 14 CFR § 27.865 certification requirements for HEC operations, or it may make no reference to HEC operations at all. When there is no mention of HEC certification in the STC and/or RFMS, the attaching means must not be used for HEC operations.

After reviewing part 133 and its regulatory history, the FAA determined that part 133 was not intended to apply to PAO. Consequently, the FAA is now working to document this determination and is assessing updates to applicable guidance and clarification of regulatory language in part 133.

**Discussion:** Some industry stakeholders believe the use of a Portable Safety Device (PSD), also known as a Belly Band System or emergency anchor, serves as an adequate backup system to the primary hook kit, even if the hook kit is not certified for HEC.

This issue was addressed in FAA Information for Operators (InFO) 12015, dated September 10, 2012. Although the InFO does not explicitly allow for the use of a Belly Band System as a backup for non-HEC certified hook systems, the FAA believes that industry stakeholders have relied on that InFO to conduct part 133 Class B HEC operations with this single hook/belly band configuration. The PSD is intended to

be used with an HEC-certified system to reduce the chance of injury/death in case of an uncommanded release by the primary attaching means. The use of a PSD does not negate any STC and/or RFMS limitations prohibiting HEC operations.

The FAA has determined that properly certified attaching means for HEC operations currently do not exist for some make/model rotorcraft utilized for HEC operations. The FAA expects manufacturers to design, develop, and certify an attaching means that complies with the certification requirements for HEC. However, in the interim, the FAA will consider petitions for a time-limited exemption. As set forth in 14 CFR part 11, operators may petition the FAA for exemption from regulations (e.g. §§ 91.9 and 133.43). To ensure that all HEC operations are conducted with properly certified and approved attaching means, the FAA has recently addressed these HEC issues, among others, by publishing Notice 8900.423, Advisory Circular (AC) 133-1B, and Order 8900.1, Inspector Guidance (May 2017).

**Recommended Action:** Part 133 rotorcraft operators are prohibited from conducting HEC operations with attaching means not certificated to HEC requirements contained in parts 27 and 29. To ensure operators are in compliance with regulations, they should be familiar with the information contained in this SAFO and AC 133-1B, and evaluate 14 CFR part 133, Rotorcraft External-Load Operations, to ensure compliance with properly certified attaching means for use with HEC and current regulations. Although part 133 applies only to civil aircraft operations, the FAA recommends public aircraft operators assess risks and apply adequate mitigation measures when conducting HEC operations.

**Contact:** Questions or comments regarding this SAFO should be directed to the General Aviation and Commercial Division's, Commercial Operations Branch at 202-267-1100 and the Aircraft Maintenance Division's, General Aviation Branch at (202) 267-1675.