



April 13, 2010

The Honorable James Oberstar, Chairman
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable John Mica, Ranking Member
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Jerry Costello, Chairman
Subcommittee on Aviation
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Thomas Petri, Ranking Member
Subcommittee on Aviation
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Oberstar, Ranking Member Mica, Chairman Costello and Ranking Member Petri:

The Air Medical Operators Association (AMOA) writes to you today in support of the H.R. 4714 "National Transportation Safety Board Reauthorization Act of 2010". We believe that this bill provides the National Transportation Safety Board (NTSB) the support necessary to enhance its ability to investigate aviation accidents and the contributing factors in those accidents, particularly those that involve human factors. The NTSB is a vital resource in accident investigation, analysis, and prevention, and is therefore a necessarily link in the chain of ensuring a safe and viable airspace that includes the Federal Aviation Administration, the Department of Transportation, and aviation operators.

Everything we know about aviation safety we learn from examining the tragedies of the past. Whether due to a mechanical malfunction, human error, or some other unforeseen disaster, the details of these accidents provide the knowledge necessary to prevent the next occurrence.

AMOA members continue to participate in two efforts that use the NTSB's accident investigation reports as their sole resource for analysis: the International Helicopter Safety Team's (IHST's) Joint Helicopter Safety Analysis Team (JHSAT) and the Opportunities for Safety Improvement in Helicopter Emergency Medical Services (OSI-HEMS) project. The purpose of both of these projects is almost identical; to analyze NTSB accident reports, determine common accident causes, and identify effective risk mitigation and safety enhancement strategies. Both projects identified a significant lack of effective reporting and investigation in these reports, especially in the area of human factors. The NTSB is aware of these issues and continues to pursue efforts to address shortfalls in its accident investigation process, especially for helicopter accidents.

We believe that in order to enhance their reporting and analysis, the NTSB will need to optimize the resources at their disposal, and we support any effort to ensure that those resources are made available. Specifically, H.R. 4714 provides funding to allow the NTSB to achieve its staffing goal of 477 full time equivalent employees. This is absolutely essential to ensure that the accident investigations and analyses are conducted in as timely and detailed manner as possible.

Prior to the February 2009 NTSB hearings on air medical transport safety, AAMS, AMOA, and HAI cooperated in a letter indicating 14 items that the NTSB should consider recommending to the FAA and Congress. Many of those recommendations were later made official by the Board. Much of the knowledge and expertise needed to make those recommendations came directly from the accident investigations provided by the NTSB; they were also able to lend their advocacy to issues identified by the community. Limiting the NTSB's ability to provide those resources- and to advocate for changes in regulations and federal policy for safety enhancements- would be a serious setback to efforts to improve safety in all modes of transportation.

Further, as we proceed in our efforts to enhance aviation safety in the delivery of air medical transport, we must continually examine our own safety record and measure our efforts to improve. While we hope that there are fewer accidents and tragedies that would require the NTSB's involvement, we do need to continually strive for improvement based on the most recent data available. For this reason we support an expansion of the NTSB's ability

to investigate incidents of consequence as well as accidents. While the two events are different and would require differences in the investigation process, some incidents can be very informative for future safety enhancements. The NTSB must also be staffed at optimum levels to take advantage of this expansion to their current investigative ability.

Finally, we support language that would require the NTSB to determine the multiple accident causes rather than any single cause. Accidents can have a multitude of causal factors leading to a single catastrophic event; many of these factors can be the result of minor systemic deficiencies or otherwise harmless oversights. Often these causes are related, and understanding the minutiae of events that result in tragedy often leads to the most significant breakthroughs in safety enhancement. For example, many of the concepts required of Safety Management Systems ensure that small oversights do not lead to systemic issues and increased risk. The elements of a Safety Management System are continually developed by examining a combination of failures, oversights, or mistakes, and mitigating those factors through more effective oversight. The examination of a multitude of casual factors in an any accident or incident will only help to maximize the effectiveness of this and other safety enhancement; and, like other advancements in the NTSB's mission, would also require the fullest extent of the NTSB's resources.

The NTSB performs a vital function to transportation safety, and provides the various transportation industries the tools they need to enhance and ensure the safe conduct of passengers and crews. The efforts of the air medical community to ensure the safety of the seriously ill or injured, and the crews that care for those patients, rely on informative and effective NTSB accident investigation and analysis. We continue to support this agency, it's dedicated workforce, and the support and expansion of their mission as proposed by H.R. 4714.

We thank the Committee for its diligence on issues related to aviation safety and look forward to working with the FAA, the NTSB, and the Congress in the development of safety enhancements and in support of efforts to investigate, analyze, and educate in the furtherance of aviation safety.

Sincerely,



Howard Ragsdale
President, AMOA



Christopher Eastlee
Managing Director, AMOA