

NPRM Submission Form



NPRM No. 18-01	Title: Aircraft Emergency Location Equipment
Date of your submission: 2 October 2017	Comment close-off date (as specified in the NPRM): 2 October 2017
Please return this submission form to the Docket Clerk by comment close-off date Email: docket@caa.govt.nz	

Please indicate your acceptance or otherwise of the proposal by placing an "X" in the appropriate box below. Any additional constructive comments, suggested amendments or alternative action will be welcome and may be provided in this form, or by separate correspondence.

The proposal is **acceptable without change**.

The proposal is **acceptable but would be improved if the following changes were made:**

The proposal is **not acceptable but would be acceptable if the following changes were made:**
(Please provide explanatory comment and use additional pages if required)

The proposal is **not acceptable under any circumstance:**
(Explanatory comment must be provided using additional pages if required)

We are aware that this NPRM has been developed as a result of work undertaken over several years.

We are concerned at the validity of data which has supported the development of this NPRM.

As we understand it, the last 12 months of Rotary Wing Accident statistics provided by CAA show that there was one ELT activation out of 17 accidents. However, data provided by the Rescue Coordination Centre showed that there had been ELT activations in 8 of the 17 instances. Such a discrepancy was evident in the data examined in the 2014 review.

TAIC and CAA research has not, to our knowledge, focused on where and how the ELT was installed, or the type of ELT or antenna used.

We understand from one of our members, Aviation Safety Supplies, that a large number of ARTEX ME406ELTs have been incorrectly installed on helicopters. Based on that company's knowledge, 75% of the ARTEX ELTs (over 300 helicopters) could be incorrectly installed.

Advice to us suggests that ELTs will not activate in a slow roll over.

The change in AC43 has allowed ELT installations more flexibility to encourage installations to be more crash worthy.

Correct installation is essential for ELTs to operate but this is not addressed in the NPRM.

Manufacturers recommend self-testing of units at specific intervals but this is not reflected in CAA documentation (91.605 (4) (ii), nor is it clear exactly what testing CAA requires for the 406MHz ELT test.

In our view, CAA should engage with industry experts who have in-depth knowledge of commercial ELT systems and correct installation and works through with them what can be done to improve aviation safety in this whole area.

Individual Details (complete if you are submitting personally)		Organisation Details (complete if you are submitting on behalf of your organisation)	
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