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

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

APR 17 2017

Julian Wheeler
HeliFlite Shares LLC
15 Brewster Road
Newark, New Jersey 07114

Dear Mr. Wheeler:

This is in response to your January 9, 2017 letter asking whether the FAA intended 14 C.F.R. § 135.168(b)(1) to apply to multiengine helicopters or single engine helicopters. In your letter, you acknowledge the regulation does not distinguish specifically between the two types of helicopters.

Section 135.168(b)(1) prohibits operation of a rotorcraft beyond autorotational distance from the shoreline unless the rotorcraft carries an approved life preserver equipped with an approved survivor locator light for each occupant. Further, except for patients transported during a helicopter air ambulance operation who cannot wear the life preserver due to medical reasons, the rule requires each occupant to wear the life preserver while the rotorcraft is beyond autorotational distance from the shoreline.

When the FAA issued its Helicopter Air Ambulance, Commercial Helicopter, and Part 91 Helicopter Operations final rule in 2014, the agency finalized the requirement that the life preserver be equipped with an approved survivor locator light. The final rule does not distinguish between multiengine and single engine helicopters for purposes of the life preserver requirement. The absence of such a distinction in § 135.168(b) signifies the agency intends the requirement to apply to all rotorcraft.

We appreciate your patience and trust that the above responds to your inquiry. If you need further assistance, please contact my staff at (202) 267-3073. This letter has been prepared by Katie Inman, Operations Law Branch, Office of the Chief Counsel and coordinated with the Air Transportation Division of the Flight Standards Service.

Sincerely,

Lorelei Peter
Assistant Chief Counsel for Regulations, AGC-200

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Time Flies.

HeliFlite Shares LLC
15 Brewster Road
Newark Intl Airport
Newark NJ 07114
1/9/2017

Dear Mr Govan,

I am writing to you in the hope of clarifying the intent of FAR Part 135.168, which will become effective from April 24th 2017.

My question relates specifically to 135.168(b)(1) which states, **"The life preserver must be worn by each occupant while the rotorcraft is beyond autorotational distance from the shoreline".** Although it does not state specifically, is this rule intended for **"multi engine helicopters"** or was the intent to safeguard **"single engine helicopter"** operations beyond autorotational distance from the nearest shoreline.

Your clarification of the above rule would be much appreciated.

Sincerely



Julian Wheeler
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