NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.400

National Policy

Effective Date:
1/12/17

Cancellation Date:
1/12/18

SUBJ: Persons Authorized to Load and Unload Air Ambulance Litter/Stretcher Systems on FAA-Certificated Aircraft

1. Purpose of This Notice. This notice clarifies the intent and application of the provisions of Title 14 of the Code of Federal Regulations (14 CFR) part 43, § 43.3(i) in regards to the removal and installation of litter/stretcher systems on aircraft.

2. Audience. The primary audience for this notice are Federal Aviation Administration (FAA) certificate-holding district offices (CHDO) and principal inspectors (PI) assigned to air ambulance operators under 14 CFR part 135. The secondary audience includes Flight Standards Service (AFS) divisions and branches in the regions and in 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. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avs.faa.gov. Operators can find this notice on the FAA website at http://fsims.faa.gov. The public can find this notice at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. Recent questions have arisen about the use of non-FAA-certificated persons to perform the loading, unloading, and reconfiguration of the litter/stretcher systems, to include the installation of isolettes, on FAA-certificated aircraft used as air ambulances. Various FAA and industry representatives have previously classified these actions as cabin conversions/reconfigurations, which would require a certificated mechanic or a pilot authorized under § 43.3(i).

a. Cabin Conversion/Reconfiguration. Cabin conversion/reconfiguration tasks are considered to be aircraft alterations and would require a mechanic certificated under 14 CFR part 65, or a pilot of a qualifying aircraft operated under part 135 (pilots are limited to the removal and re-installation of specific items as stated in § 43.3(i)). The intent of § 43.3(i) was to permit complete cabin conversions/reconfigurations, normally a maintenance item, by trained pilots.

b. Passenger-to-Cargo or Passenger-to-Stretcher Conversions. A 2016 FAA memo states, “The preamble to the 1996 Final Rule adopting § 43.3(i) makes clear the rule addressed cabin reconfigurations involving passenger-to-cargo or passenger-to-stretcher conversions. The 1996 amendment was prompted by a flood of petitions for exemption (over 250 at the time

of the rulemaking) from § 43.3(g). Historically, most of the early petitions involved operations in remote areas where mechanics were scarce or unavailable. Later most petitions involved requests from operators to allow their properly trained pilots to reconfigure cabin seats when flying missions of an emergency nature during times—at night and on weekends—when certificated mechanics were not normally available and time was of the essence. (61 FR 19498, May 1, 1996)."

c. Intent. As indicated in subparagraph 4b, the preamble to § 43.3(i) demonstrates the rule was intended to facilitate cabin conversions and/or reconfigurations. For the purposes of this discussion, Advisory Circular (AC) 135-14, Helicopter Air Ambulance Operations, distinguishes between the types of reconfigurations contemplated by § 43.3(i) and the types of activity that may be performed by a pilot or other personnel on the aircraft. For example, AC 135-14, chapter 5, paragraph 5-5b(1) states: "Each installation should be evaluated at its time of approval to determine if a mechanic is required to perform installation or if other personnel can be trained for its removal or replacement." Clearly, each situation must be evaluated on its own merits to determine if it falls within the intent of § 43.3(i), or whether it is a simpler process as contemplated by the AC (i.e., whether "other personnel can be trained for its removal or replacement"). These evaluations are normally accomplished by the operator using FAA guidance, best practices, and industry norms.

5. Action. Tasks associated with the loading and unloading of medical litter/stretcher systems (including isolettes) from an aircraft used for the purposes of an air ambulance is not considered to be cabin conversions/reconfigurations. For clarification, simply sliding litters/stretchers into or out of an aircraft (helicopter or airplane), where the litters/stretchers are secured by a quick connect latching mechanism, where no tools are required, is not an alteration of the aircraft. This is simply an operation of the litter/stretcher system as designed. Similarly, the loading and securing of an isolette, either onto an existing litter/stretcher mount or other appropriate area of the aircraft cabin, is not an aircraft reconfiguration (refer to AC 135-14). These tasks may be performed by trained personnel other than persons certificated under 14 CFR parts 61 and 65. There may be operational issues to address, but these actions are part of operating the system as designed and are normally completed by the pilots as required (such as in the case of weight and balance calculations due to loading an isolette).

6. Disposition. We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions or comments regarding this notice to the Aircraft Maintenance Division, General Aviation Branch (AFS-350) at (202) 267-1675.



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