Airwolf Aerospace- Statement on the Bell 212 Accident. 10-21-2024

All of us here at Airwolf Aerospace were saddened by the news of the accident and the death of the pilot, Tom Frith. Our hearts go out to his loved ones, friends, and coworkers. We, like any aviation parts supplier would be, were devastated by the thought that our component could have been the cause of the accident.

We have been hesitant to issue statements about the Bell 212 accident and the failure of an Airwolf TT Strap in deference to the Canadian Transport Safety Board’s ongoing investigation. Information, though, has come to light about the issuance of the FAA AD that essentially forces our hand to inform the helicopter community of the situation.

We would first like to state some facts about our own investigation before we discuss our issues with the FAA’s procedures preceding the issuance of the AD.

* Airwolf has found no irregularities with the production of our TT Straps
* All TT Straps are pulled to load that would be seen on an overspeed of the rotor system prior to shipment. We have not seen any abnormalities.
* As a quality check we randomly take TT Straps from production for ultimate load pull testing. We, by coincidence, had pull tested a strap from the lot of the accident strap to ultimate failure. The TT Strap saw a load of 207,580 pounds before breaking which gives the strap a safety margin of 1.89 times over the operating load.
* Airwolf has received and examined XX medium TT straps from the field. We have not seen any urethane or other issues. We have pulled XX to acceptance test loads and XX to ultimate failure and all have met or exceeded the requirements.

 **Our Issues with the FAA Airworthiness Directive:**

The AD states that, “Investigations into individual wire failure mechanisms are ongoing with early indications suggesting some wires possibly failed in tensile overload and others in fatigue.” This may sound like evidence of a TT Strap issue, however, as evidenced by the Transport Safety Board of Canada not yet determining the root cause or causes of the failure and Transport Canada not issuing an AD, it is obvious the TT strap has not been identified as the definitive root cause. A TT strap that was manufactured correctly and performed as designed, but was subjected to repeated stresses outside of its design limit would show evidence of tensile overload and fatigue.

The AD has a 45 day comment period. We, of course, plan to send our comments to the FAA and have accessed the public Docket. We found that there is no substantive information in the docket that allows a comprehensive response and what little information that is contained in docket is incomplete and misleading. The lack of information in the document not only makes it very difficult for us or anyone else to comment on the AD it also violates the Administrative Procedure Act

An AD is enforceable by Law and as such, FAA procedures used in issuing an AD must comply with the Administrative Procedure Act. This act requires the FAA to have a public docket that justifies its actions. As mentioned above, the docket is essentially empty of any information that would justify the FAA’s issuance of the AD taking away our STC approval and removing the straps from the field.

 Our legal counsel believes that our rights have been violated and has asked the FAA to provide the information that is required by the Administrative Procedure Act. Our Legal Counsel believes that there is absolutely no evidence in the docket of the agency’s investigation of the accident or the failure of the TT strap. The FAA AD process demands an independent evaluation of safety information pertinent to the accident, and thus the failure of the TT strap, including the operating conditions, aircraft history and usage, other design, manufacturing, operational, or maintenance conditions or information upon which decisions can be or were made.

In addition, the agency procedures specifically encourage communications to obtain information that resolves questions of substance. Rather the agency reached its conclusion and issued an emergency action on “indications” and “possible” failure modes during an ongoing investigation of the Canadian government.

We all desire a definitive answer to what caused the TT Strap to fail. We are cooperating and will continue to cooperate with the TSB investigation, Transport Canada, and the FAA. We are working with the returned parts from the field to try to find any clue that could help determine a root or contributing cause and so far, we have yet to identify a cause. The information that we have seen and the lack of information in the docket though, leads us to believe that the FAA did not base the AD on facts and that they have not complied with the Administrative Procedure Act resulting in a violation of rights.

The 45 day comment period ends November 10, 2024. We encourage anyone with any pertinent information based on their experience with medium Bell helicopter rotor systems to comment.