



## Interagency Helicopter Operations Subcommittee

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IHOPS-20-02

**Date:** February 26, 2020  
**To:** Chair, National Interagency Aviation Committee  
**From:** Chair, Interagency Helicopter Operations Subcommittee  
**Subject:** Re-Memo 18-09, Questions to our Response

### BACKGROUND:

The IHOPS subcommittee response to the questions from NIAC regarding Memorandum 18-09 - re-typing aircraft.

### RESPONSE:

- 1. What research did IHOPS or the recommending agency complete prior to suggesting the modifications to both the values (weight) and reference (take off gross weight vs. max internal gross weight) used regarding aircraft weight?**

*IHOPS was briefed on this recommendation from the USFS committee member. The USFS created a working group to determine the new "definitions" submitted for review.*

*USFS team that worked on "updated" definitions referenced 14 CFR 27.1 (a) which states:*

- Prescribes, airworthiness standards for the issue of type certificates, and changes to those certificates, for normal category rotorcraft with maximum weights of 7,000 pounds or less and nine or less passenger seats.)*

*Increasing the Type 2 Internal Gross Weight to 7,001 lbs. to 14,000 lbs. (Increasing the maximum to 14,000 lbs. will allow the 214B to be considered a "medium" helicopter. Vendors are currently adjusting aircraft from 214B or 214B-1 depending on order type and agency preference.)*

*Take-off weight vs. internal gross weight – Internal gross weight was used to prevent vendors from changing helicopter equipment (Skid gear) to move their helicopter from one class/type to another, see example in question #4 below!*

**2. Did IHOPs consider the effects on currently typed aircraft with low internal gross weight values (KMAX)?**

*IHOPs did consider the effects the new “definition” would have on the KMAX, however the definition submitted failed to reflect that. The “definition” should read:*

*Heavy Helicopter: A helicopter with a certified internal gross weight of 14,001 pounds or greater. Under the ICS helicopter typing system, a heavy helicopter is a Type 1 helicopter and has 10 + passenger seats (unless restricted category). Based on the KMAX limited use and its payload being over 3300 lbs. it is considered a Type 1.*

**3. What is the desired outcome from singling adjustments to the definitions without other changes to the typing reference materials?**

*Desired outcome is to match definitions with current and future make and model aircraft.*

*Example: Vendor submits an aircraft for contract that agencies have never contracted with prior “next generation”. AC has 9 passenger seats but has an internal gross weight less than 7000 pounds. Which type of aircraft would this AC fall into?*

*Other reference materials would need to be updated, i.e. NWCG Standards for Helicopter Operations, training materials, etc.*

**4. If this is in response to a single agency’s contractual issue, is the modification of significant Interagency reference material the appropriate solution? Should NIAC, NWCG, IHOPs be in the business of solving contract disputes? What potential disputes does this change create?**

*No, although the USFS contracts the majority of type 1 contracts in the United States, this change will benefit our State cooperators as well.*

*Example: CDF orders the Bell 214 as a standard helicopter used to transport passengers, all other federal agencies (when ordering a 214) use as a restricted category (type 1) helicopter. 214 vendors are changing their placards to fit/fill order appropriately. Some*

*have changed to 412 skid gear to lower their internal gross weight to that of a 212/412 which puts them into the current “medium” category.*

*USFS contract specifications have or will be changing.*

***Light Helicopter:*** *A helicopter with a certified internal gross weight of 7,000 pounds or less. Under the ICS helicopter typing system, a light helicopter is a Type 3 helicopter and has 9 or less passenger seats.*

***Medium Helicopter:*** *A helicopter with a certified internal gross weight of 7,001 to 14,000 pounds. Under the ICS helicopter typing system, a medium helicopter is a Type 2 helicopter and has 9 or less passenger seats (unless restricted category).*

***Heavy Helicopter:*** *A helicopter with a certified internal gross weight of 14,001 pounds or greater. Under the ICS helicopter typing system, a heavy helicopter is a Type 1 helicopter and has 10 + passenger seats (unless restricted category). Based on the KMAX limited use and its payload being over 3300 lbs. it is considered a Type 1.*

Documents affected by this change: Red Book, Mobilization Guide, IHOG, IRPG, Aircraft Identification Guide, Areal Supervision Guide, S-271, S-270, S-372, S-378

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