

June 29, 2017

To: Ms. Courtney Liedler, Air Safety Investigator
From: Ms. Delane Baker, Safari Helicopter [REDACTED]
Re: CEN15LA104, Safari Helicopter, N416JB Woodlands, TX

Dear Ms. Liedler,

Please consider this our interpretation of the findings from the factual evidence described in the draft Factual Report. We have also drawn conclusions from information omitted from the draft Factual Report.

While we do not dispute that the horizontal stabilizer on the accident aircraft exhibited fatigue cracking and broke off in flight, that was not the cause of the accident.

The passenger side door was found undamaged 85' antecedent to the crash site. The doors are easily damaged, as are the hinges attaching it to the helicopter. As shown in the picture below, if properly latched, the door cannot come open.



We believe that the passenger side door was not properly latched on takeoff. One witness described the "windshield" of the helicopter coming off, which we believe was the passenger side door. Three of the eyewitness reports mention the helicopter flying "sideways" before going down. This is consistent with accidental movement of the pedal and/or cyclic as the pilot tried to reach for the passenger side door.

June 29, 2017

RE: CEN15LA104, Safari Helicopter, N416JB Woodlands, TX

Page 2 of 2

It is extremely easy to lose control of a helicopter, particularly a smaller helicopter with more sensitive controls. We believe that the inexperienced (in rotorcraft) pilot over-reacted when he realized that he was moving the pedal and cyclic as he reached for the door and lost control of the helicopter. The violent movement resulting from the loss of control broke the horizontal stabilizer off the helicopter. At the point that this occurred, the helicopter was spinning out of control.

It is apparent that the door came off the helicopter prior to the accident. It is not reasonable to assert that two parts fell off the helicopter as it flew along normally.

The Mandatory Inspection 003 we issued in response to the Materials Laboratory Factory Report states that "while it should not be a catastrophic failure if the helicopter is being operated within the Center of Gravity envelope, it would change the attitude of the helicopter and be very alarming to the pilot. In the event of such a failure, the cyclic should be moved back in a controlled fashion (not abruptly) to correct the attitude of the helicopter. The collective should not be lowered abruptly. The aircraft should be landed normally as soon as practical."

The draft report effectively disputes our statement, asserting "Given that the stabilizer provides a downward-acting force on the tail section of the helicopter, this attitude change would be experienced by the pilot as an abrupt, uncommanded nose-down pitch." According to the eyewitness reports, the helicopter did not pitch nose-down, and photos of the scene show that it did not strike the ground nose-down. It is our position that the helicopter was already out of control when the stabilizer came off, and it had little or no effect on the outcome.

Other factors contributing to the pilot's inability to regain control of the helicopter:

- Pilot's size prevented full movement of cyclic stick
- Pilot's lack of rotorcraft experience caused inappropriate inputs to the controls
- Extremely low altitude did not allow any time for recovery – at the reported altitude, from loss of control to impact would have been only a few seconds