



Frank Hoffmann
Scott's-Bell 47
General Manager

4-11-2018

Dear Mr. Malinowski,

Scott's Helicopter Services, Inc. (SHS) and Scott's-Bell 47, Inc. (SB47) have reviewed the submitted documents surrounding NTSB case CEN17LA264. Our comments are as follows:

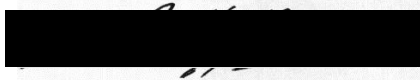
- a) Mr. Joe Epperson's Report No. 17-092 references in section C. "Details of the Examination" Part Number 91-110-122-1 "Core Assembly". Upon review of our documentation, the correct Part Number should be 47-110-122-1 "Core Assembly".
- b) Report No 17-092 identifies the examined Part Number 47-110-122-1 "Core Assembly" as a "Spar". This terminology could lead to confusion. A spar is generally associated with a part providing or adding structural integrity. In this case, the Core Assembly is essentially an iron bar, running inside a channel along the leading edge of the entire blade length. The Core Assembly is only attached to the blade at the root, simply providing mass for proper balancing of the blade. It is not a structural part and therefore should not be defined as a spar.
- c) With regards to Mr. Christopher Richard's Communication Summary dated August 23, 2017, we can only wholeheartedly agree with his assessment. We also believe that the blades did not just depart as claimed, but that the helicopter in flight did strike the operation's truck. This disposition is based on the findings of SHS's two internal assessor's that had been dispatched to the crash site after SHS had been contacted by Mr. Oleen. Mr. Oleen had not reported the incident to the FAA at this point and had to be "coached" into filing such a report by SHS personnel. In addition, the majority of the evidence had already been moved by the time SHS personnel arrived, such as that all the rotor blade debris was already heaped up in the bucket of an excavator, placing a factual reconstruction of the incident completely in the hands of the party involved. Very odd and unusual for such a "catastrophic failure".

The parts that SHS personnel were able to see all coincide with Mr. Richard's findings, in that everything points to failure in overload, namely, an object strike under load.



As the Type Certificate holder, SB47 would recommend looking closer at the transmission for signs of overload common with a rotor strike. In addition, a good witness feature for this type of case could be the metal ballast box located just inboard of the blade tip. If a rotor strike caused this incident, deformation of this ballast box would show a different pattern than, as Mr. Oleen claims, the blade just coming off. Thirdly, an assessment of where the blade debris was actually located could also be a great indicator of blade trajectory; however, as the debris had already been moved prior to any investigators arriving, this option had never presented itself.

Best Regards,



Hoffmann
-General Manager-