



National Transportation Safety Board

Washington, D.C. 20594

March 9, 1990

Mr. J. N. J. Van Rensburg
Rooth & Wessels
P. O. Box 208
Pretoria, 001
REPUBLIC OF SOUTH AFRICA

Dear Mr. Van Rensburg:

On behalf of the National Transportation Safety Board (NTSB), thank you for the opportunity to review the report of the investigation of the accident involving the Helderberg. I also appreciate the opportunity the Board of Inquiry has provided to the advisors to the NTSB to review and comment on the draft report. The comments of the Boeing Company and the Federal Aviation Administration, which represent the views of those organizations and not of the NTSB, are enclosed for your review.

The efforts of the investigative team of the Republic of South Africa to gather evidence to enable the Board of Inquiry to determine the probable cause of this accident have made a real contribution to accident investigation and to aviation safety. I believe that the team, under the firm direction of Mr. R. W. Van Zyl, consistently placed the needs of the investigation above its own personal needs despite considerable personal sacrifice. I am honored to have been able to assist the team to a small extent.

The draft report is an excellent compendium of the facts of the investigation. The NTSB agrees with all conclusions, recommendations and the probable cause, with the exception of Recommendation No. 6.1 which states:

The Combi type of configuration, with passengers and cargo on the same deck and provision for fire fighting on the cargo deck based on, inter alia, crew access to the seat of the fire and hand fire extinguishers to fight the fire, should be prohibited as creating an unacceptable risk to life and property.

The Safety Board has issued Safety Recommendations A-88-61 through 63 to address what it considered to be deficiencies in the fire detection and suppression methods used in class B cargo compartments, the type found on the main deck of the Boeing 747 Combi. In response to these recommendations and as a result of its own review into the safety of class B compartments, the FAA has issued a Notice of Proposed Rulemaking (NPRM) in advance of its

issuance of an airworthiness directive. The NPRM and the Safety Recommendations have been included in the draft report as Appendices G and E, respectively. The airworthiness directive that was issued as a result of the NPRM, airworthiness directive No. 88-NM-80-AD, effective September 25, 1989, effectively upgrades the fire detection and control capabilities of class B compartments considerably beyond those in effect at the time of the Helderberg accident. Although I agree in principle with Recommendation 6.1, I believe that it should be revised to address the fire suppression and fire detection capabilities that will be in place in the main deck cargo compartments of Combi aircraft following implementation of the airworthiness directive.

Again, thank you for the opportunity to review the draft. I look forward to receiving the final report.

Sincerely,

Barry Strauch
Barry Strauch
U.S. Accredited Representative