



OPERATIONS MEMO O-17-01

To: All Pilots

From: Dave Jones
Chief Pilot

Date: February 14, 2017

Subject: **§135.87 Carriage of cargo including carry-on baggage.**

Effective immediately, items that exceed the aircraft floor loading limits or will cause damage to the aft cabin (windows, seats, and floor) will not be transported internally.

In addition, all pilots will ensure compliance with the following:

- Cabin floor loading limitations will not be exceeded.
- Baggage compartment loading limitations will not be exceeded.
- All cargo loaded into the cabin will meet the requirements stated below.
- Aft cabin passengers will have access to both exits.
- Cargo that poses a high risk of aircraft damage while being loaded/unloaded or transported should be carried externally.

Listed below is the expectation/legality of carrying internal cargo in our aircraft.

§135.87 Carriage of cargo including carry-on baggage (extract).

(c) It is carried in accordance with each of the following:

(1) For cargo, it is properly secured by a safety belt or other tie-down having enough strength to eliminate the possibility of shifting under all normally anticipated flight and ground conditions, or for carry-on baggage, it is restrained so as to prevent its movement during air turbulence.

(2) It is packaged or covered to avoid possible injury to occupants.

(3) It does not impose any load on seats or on the floor structure that exceeds the load limitation for those components.

(4) It is not located in a position that obstructs the access to, or use of, any required emergency or regular exit, or the use of the aisle between the crew and the passenger compartment, or located in a position that obscures any passenger's view of the "seat belt" sign, "no smoking" sign, or any required exit sign, unless an auxiliary sign or other approved means for proper notification of the passengers is provided. **(See Note 1)**

(5) It is not carried directly above seated occupants.

(6) It is stowed in compliance with this section for takeoff and landing.

(7) For **cargo only operations**, paragraph (c)(4) of this section does not apply if the cargo is loaded so that at least one emergency or regular exit is available to provide all occupants of the aircraft a means of unobstructed exit from the aircraft if an emergency occurs. **(See Note 2)**

NOTE 1: Emergency exit requirements are stated in **Part § Part 27 Airworthiness Standards Normal Category Rotorcraft requirements**. Both exits must be readily accessible to each passenger.

§27.807 Emergency exits (extract).

(a) *Number and location.* (1) There must be at least one emergency exit on each side of the cabin readily accessible to each passenger. One of these exits must be usable in any probable attitude that may result from a crash;

Note 2: §135.85 Carriage of persons without compliance with the passenger-carrying provisions of this part doesn't apply to passengers, this person must be authorized by the FAA and is required to be performing a duty connected with the operation.

§135.85 Carriage of persons without compliance with the passenger-carrying provisions of this part

(g) A person, authorized by the Administrator, who is performing a duty connected with a cargo operation of the certificate holder.

If you have any questions contact Dave Buzga at (907) 235-7771 or Dave Jones at (907) 452-1197.