



October 28, 2016

Fran Cox
Manager, Southwest Region—Aircraft Certification Service
Federal Aviation Administration Southwest Regional Office
10101 Hillwood Pkwy
Fort Worth, TX 76177

RE: Request for Global AMOC to reconcile AD 2016-16-12 conflict between paragraphs (e)(5) Removal from Service and (f) Installation Prohibitions

Dear Ms. Cox:

The Aircraft Owners and Pilots Association (AOPA) hereby requests a Global Alternative Means of Compliance (AMOC) with Airworthiness Directive 2016-16-12 (“the AD”) which mandates removal from service of certain PMA cylinder assemblies produced by Airmotive Engineering Corporation, marketed under the “ECi” tradename, and used on certain Continental Motors 470-, 520- and 550-series engines.

We are requesting this Global AMOC in order to reconcile what we believe to be a serious conflict between the wording of paragraph (e)(5) of the AD (titled “Removal From Service”) and paragraph (f) of the AD (titled “Installation Prohibitions”).

In particular, paragraphs (e)(5)(ii) and (e)(5)(iii) of the AD permit affected cylinder assemblies with more than 680 operating hours TIS since new on the effective date of the AD to continue in service until 1,160 operating hours TIS, at which time they must be removed from service. However, paragraph (f)(4) of the AD prohibits an aircraft to be returned to service if any affected cylinder has 1,000 or more operating hours TIS. This appears to mean that if an aircraft having an affected cylinder with more than 1,000 hours but less than 1,160 hours has any maintenance performed on it, even maintenance completely unrelated to the engine (such as a tire change), the aircraft cannot be returned to service unless the cylinder is replaced. This strikes us as unreasonable and probably not what the FAA intended, and we fear it might cause operators to forgo maintenance in order to avoid triggering the requirement for premature cylinder replacement. Keep in mind that the aircraft affected by AD 2016-12-16 fly roughly 100 hours per year on average, so the difference between 1,000 hours and 1,160 hours could represent a year or two of additional operation.

Consequently, AOPA hereby requests approval of a Global AMOC that replaces paragraph (f)(4) of the AD with the following alternative paragraph:

(4) Do not return to service after maintenance any aircraft that has an engine installed with an ECi cylinder assembly subject to this AD if the cylinder assembly is required to be removed from service by paragraph (e)(5) of this AD.

Thank you in advance for your timely consideration of this request.

Sincerely,

David Oord
Sr. Director, Regulatory Affairs
Aircraft Owners and Pilots Association