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July 20, 2020

U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: FAA Docket Number FAA-2018-1046; Product Identifier 2018-CE-049-AD; Supplemental Notice of Proposed Rulemaking; Piper Aircraft, Inc., Models PA-28-140, PA-28-150, PA-28-151, PA-28-160, PA-28-161, PA-28-180, PA-28-181, PA-28-235, PA-28R-180, PA-28R-200, PA-28R -201, PA-28R -201T, PA-28RT-201, PA-28RT-201T, PA-32-260, and PA-32-300 airplanes

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation membership association representing individuals who collectively operate 85% of all general aviation aircraft in the United States. AOPA respectfully submits this comment in response to the Supplemental Notice of Proposed Rulemaking (SNPRM) for certain Piper Aircraft, Inc. models of PA-28 and PA-32 aircraft.

On December 21, 2018, the FAA published a Notice of Proposed Rulemaking (NPRM) to adopt a new AD for an estimated 19,696 Piper Aircraft, Inc. (Piper) model PA-28 and PA-32 airplanes. The proposed corrective action would require calculating a factored service hours for each main wing spar to determine if an inspection is required, inspect the lower main wing spar bolt holes for cracks, and replace any cracked main wing spar(s). Comments closed on February 4, 2019.

On June 3, 2020, the FAA published a Supplemental Notice of Proposed Rulemaking (SNPRM) that revised the applicability and the estimated costs associated with the proposed AD actions. It also clarifies the applicability and proposed actions, proposes the replacement wing spar to be of new condition, and proposes to require an additional burden of an eddy current inspection in accordance with a recently published Piper service bulletin.

AOPA appreciates the FAA's work to address many of the public comments through changes and clarifications in the SNPRM. However, AOPA wishes to communicate new and continued concerns with the SNPRM.

SCOPE AND MODEL APPLICABILITY REMAINS TOO BROAD

AOPA appreciates the FAA's consideration of AOPA's and other's concerns of the overly broad selection of applicable aircraft by removing Piper PA-28-140, PA-28-150, PA-28-160, PA-28-161, and PA-28-180 models from the scope of the AD. However, models PA-32R-300, PA-32RT-300, and PA-32RT-300T were added. AOPA remains concerned that the proposed

applicability change still includes certain models that are not representative of the accident aircraft that precipitated this AD.

We have heard from several AOPA members citing concerns of the continued applicability of the PA-28-151 and PA-28-181 models. Several models removed from applicability in the SNPRM have similar characteristics in both airframe and horsepower as the PA-28-151 and PA-28-181 models (e.g., PA-28-160, PA-28-161, PA-28-180). One member calculated a wing load of less than 95% of baseline for the PA-28-151.

AOPA also supports Piper's position for a more representative and limited group of aircraft applicable under this AD. The aircraft manufacturer, with the technical expertise and vested interest in the continued operational safety of its aircraft, has relevant and important information regarding various design factors, loads, and fatigue spectrum and has proposed that all PA-28 and PA-32 models do not warrant invasive and potentially damaging inspections.

AOPA believes, based upon Piper's and PA-28/32 owner/operators' experience and knowledge regarding this AD, the FAA should re-visit the proposed model list, evaluate the respective model design loads and fatigue spectrum and revise as needed, specifically models PA-28-151, PA-28-181, and the newly added PA-32R-300 and PA-32RT-300/T. As with any corrective action, especially one involving removal and inspection of spar attachment bolts, we must be cognizant of any adverse impacts to safety and/or airworthiness. Therefore, it is of utmost importance for a representative and limited group of aircraft to be impacted by this AD.

FACTORED TIME IN SERVICE FORMULA

AOPA appreciates the FAA's explanation of the factored time in service formula. However, the formula still does not provide an alternative pathway for consideration of missing or incomplete records, unless the Hobbs/tachometer time continuity shows the airplane did not operate during a time of dormancy. As the average age of single-engine piston aircraft in the U.S. now over 46 years,¹ it will only become more difficult for aircraft with missing logbooks to meet this, or other ADs, without considerable cost and risk to safety through invasive inspections. AOPA recommends the FAA address and develop a safe pathway for relatively low time airframes with a missing and/or incomplete logbook.

INTERIM ACTION NOT APPROPRIATE

In the SNPRM, the FAA continues to consider the AD as an interim action, and based on reports and additional data, may take further rulemaking action. Like our comment to the NPRM,² AOPA continues to consider this proposed AD as an intrusive and expensive exploratory action for over 5,000 aircraft. We continue to believe there are less onerous and effective methods to alert aircraft owners of an airworthiness concern, including an Airworthiness Concern Sheet, manufacturer Service Bulletins, and/or Special Airworthiness Information Bulletin (SAIB) – all of which can be used to solicit data and inform corrective actions. AOPA offers our full support and assistance in any of those efforts.

¹ https://gama.aero/wp-content/uploads/GAMA_2019Databook_Final-2020-03-20.pdf

² <https://www.regulations.gov/document?D=FAA-2018-1046-0158>

AOPA appreciates the FAA's consideration of our comment on this important issue. With the average age of single-engine piston aircraft in the U.S. now over 46 years,³ AOPA acknowledges the risks of aging aircraft and fatigue will have on the future continued operational safety of the general aviation fleet. We stand ready to work with the FAA, affected aircraft owners, type clubs, and manufacturers to manage that risk. Please feel free to contact me at 202-737-7950 if you have any questions.

Sincerely,



Christopher J. Cooper
Director, Regulatory Affairs

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in General Aviation aircraft. Representing two-thirds of all pilots in the United States including several thousand UAS operators, AOPA is the largest civil aviation organization in the world.

³ https://gama.aero/wp-content/uploads/GAMA_2019Databook_Final-2020-03-20.pdf