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June 29, 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–2020-0472; Product Identifier 2018-CE-060-AD; Proposed Airworthiness Directive impacting the tailcone and horizontal stabilizer attachment structure of multiple models of Textron Aviation Inc. 180, 182, and 185 aircraft

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 proposed Airworthiness Directive (AD) involving multiple models of Textron Aviation Inc. 180, 182 and 185 aircraft.

On May 14, 2020, the FAA published a notice of proposed rulemaking (NPRM) to adopt a new AD that would require the visual inspection of the tailcone and horizontal stabilizer area attachment structure and require removal and replacement of those identified parts impacted by corrosion, cracks and/or loose or sheared rivets. The FAA determined an unsafe condition exists due to thirty (30) Textron 180 and 185 aircraft with cracks discovered in the tailcone and horizontal stabilizer attachment structure because of the attachment structure design and high loads during landing. An estimated 6,586 aircraft are impacted, costing $170 for an inspection, to over $18,000 to remove and replace all identified parts in this AD.

AOPA supports the need for continuing airworthiness processes and ADs where an unsafe condition exists. While corrosion and cracking in any aircraft is cause for concern for creating an unsafe condition, based on the minimal information provided and issues raised by the public that were not addressed in the proposed rule, AOPA recommends the FAA provide additional information through a Supplemental Notice of Proposed Rulemaking. Doing so will provide the public additional insight and rationale for the determination of an unsafe condition, and the applicability and inspection requirements of this proposed AD.

The Proposed Rule Must Provide Clarification on These Issues

1. Why this AD should apply to Textron 182 models: The aircraft found to have had cracking and corrosion damage were Textron 180 and 185 models. It is suggested that

due to the tricycle design, 182 models would not experience high loads during landing compared to the 180/185 models.

2. Why compliance with SEL-55-01 and/or an annual inspection cannot qualify for "credit for previous actions:" It appears the requirements necessary for SEL-55-01 and/or an annual inspection would provide for a similar visual inspection as that of the proposed AD. If an equally effective option to visually inspect for cracking and corrosion can be performed at a lower cost, while maintaining an equivalent level of safety, it would be incumbent on the FAA to ensure it has explored those options with an explanation of its findings.
3. Have all causes of potential damage been scrutinized? Some individuals have suggested to AOPA that other sources of damage to the tailcone and horizontal stabilizer area attachment structure may have resulted in the cracking and/or corrosion discovered. Specifically, there is reported risk of these areas to become worn and cracked from ground personnel moving the aircraft by the horizontal stabilizer.

AOPA appreciates the hard work the FAA does to ensure continued airworthiness for a large and diverse general aviation fleet. With the average age of single-engine piston aircraft in the U.S. now over 46 years,[1] 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.

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