



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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July 11, 2007

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Docket No. FAA-2007-27611 Airworthiness Directives; Sierra Hotel Aero, Inc. Models Navion (L-17A), Navion A (L-17B), (L-17C), Navion B, Navion D, Navion E, Navion F, Navion G, and Navion H Airplanes

The Aircraft Owners and Pilots Association (AOPA), representing more than 412,000 members, or two-thirds of the nation's general aviation pilots, submits the following comments to the Federal Aviation Administration's (FAA) Airworthiness Directives; Sierra Hotel Aero, Inc. Models Navion (L-17A), Navion A (L-17B), (L-17C), Navion B, Navion D, Navion E, Navion F, Navion G, and Navion H Airplanes Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Thursday, April 12, 2007.

To decrease the burden on the pilot community, maintain the current level of safety and ensure that any AD resulting from this NPRM correctly addresses the fuel systems currently installed in the Navion fleet, AOPA requests that the FAA actively solicit and evaluate alternate means of compliance (AMOCs) from industry, including type clubs and current STC holders for Navion aircraft.

AOPA Requests FAA Solicit and Evaluate All Alternate Means of Compliance

The FAA proposes an airworthiness directive for multiple Navion models that would require a one-time inspection of the entire fuel system and repetitive inspections of certain fuel valves until these valves are replaced.

Explanation of proposed airworthiness directive: The proposed airworthiness directive (AD) is a result of accident reports involving Navion aircraft in which loss of engine power was a contributing factor. The National Transportation Safety Board (NTSB) determined the power loss, in some of these accidents, was a result of a defective fuel selector valve or a defective gasolator. These defective parts allowed air into the fuel system, which caused a disruption in the flow of fuel to the engine resulting in decreased engine power.

The proposed AD would require Navion owners to have the fuel system inspected and the fuel selector valve inspected and tested within 100 hours of time-in-service or 12 months. The proposed AD also calls for repetitive inspections of the fuel selector valve every 12 months until the valve is replaced with a fuel selector valve specifically listed in the proposed AD.

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AOPA recommendation: The FAA should strongly consider and evaluate all alternate means of compliance submitted to this proposed AD. Alternate means of compliance (AMOCs) allow the FAA to address the safety concerns outlined in the proposed AD while mitigating any undue burden on the pilot community.

The association appreciates the FAA's efforts to ensure the safety of the existing Navion fleet; however, the FAA should actively solicit and evaluate AMOCs to the proposed AD. AMOCs grant a degree of flexibility to aircraft owners and mitigate the burden of complying with an AD while still addressing the underlying safety concern.

An example of an AMOC for the proposed AD was submitted by the American Navion Society to the FAA. The American Navion Society's Field Service Bulletin No.1001, which was used as the basis for the AMOC, was also published in the May/June edition of *Navioneer*. This AMOC outlines intervals for inspecting the entire fuel system, testing procedures for the fuel system and valve replacement criteria but does so in a way that minimizes the impact to the individual aircraft owner by allowing owners with faulty fuel selector valves to choose the correct FAA approved replacement valve for the fuel system configuration of their aircraft. The proposed NPRM limits the replacement fuel selector valve options and may not provide appropriate options to all aircraft owners.

Of the approximately 1,500 Navions on the aircraft registry, some have fuel systems that have been modified by FAA approved STCs. The FAA should actively contact these STC holders and encourage them to submit their STCs as an alternate means of compliance for the proposed AD. Any mandatory compliance measures, whether inspection, testing, or fuel selector valve replacement, need to explicitly include or exclude any Navion that has a fuel selector valve that was replaced as part of an FAA approved STC.

Summary

The association appreciates the FAA's efforts to ensure the safety of the general aviation fleet and looks forward to the inclusion of AMOCs in this proposed AD. The association believes this will allow the 1,500 Navion aircraft currently on the aircraft registry to appropriately choose the compliance method that causes the least amount of burden, is appropriate to the fuel selector valve currently installed in the aircraft and maintains the level of safety sought in the NRPM. To that end the FAA should rely on, and actively solicit, alternate means of compliance for this proposed AD from industry.

Sincerely,



Robert E. Hackman
Senior Director
Regulatory Affairs