



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798  
Telephone (301) 695-2000 • Fax (301) 695-2375  
www.aopa.org

---

August 17, 2007

Docket Management System  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E.  
West Building, Ground Floor  
Room W12-140  
Washington, DC 20590-0001

### **Re: Docket No. FAA-2005-21829 Parachute Equipment and Packing**

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 members, or two-thirds of the nation's general aviation pilots, submits the following comments to the Federal Aviation Administration's (FAA) Parachute Equipment and Packing Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Tuesday, May 22, 2007.

AOPA supports the FAA's efforts to extend the packing interval for certain types of parachutes from 120 to 180 days. The proposed extended packing duration is appropriate as advances in parachute construction technology have made canopies and other parachute components more resistance to mildew, moisture, and other factors that degrade the quality of the parachute.

### **AOPA Supports the Proposed Extended Duration of Parachute Packing Intervals**

*The FAA proposes to extend the packing interval for parachutes with canopies, shrouds, and harnesses made exclusively of nylon, rayon or other synthetic materials from 120 to 180 days.*

Explanation of proposed regulatory change: This proposed regulatory change is a result of a petition for exemption submitted to the FAA in 2005 by the Parachute Industry Association (PIA). The petition sought an exemption from the 120-day parachute repacking interval required by portions of 14 CFR FAR 91.307 and FAR 105.43, titled "Parachutes and Parachuting" and "Use of Single-harness, Dual-parachute Systems" respectively.

As a basis for the petition, PIA cited advances in parachute canopy technology. The majority of canopies manufactured today are made from synthetic material, such as nylon or rayon, and are less prone to damage by moisture and mildew. Coatings are also applied to canopies to reduce permeability and further protect the material. The petition

August 17, 2007

also noted that frequent handling of these new materials and coatings could actually cause damage. These advances, combined with the widespread industry use of these materials, were the basis of the petition and, now, the proposed regulatory change.

The FAA has extended the packing interval for parachutes twice in the past. On both occasions the justification for the extension was a change in the type of material used to construct the parachute canopy. A further extension at this point in time would acknowledge newer construction materials and coatings and follow closer to the repacking interval parameters used by the United States military and other countries. These packing intervals range from 120 days to one year.

*AOPA recommendation: The FAA should implement the proposed regulatory changes to 14 CFR FAR 91.307(a) and FAR 105.43(a) and (b)(1).*

Parachutes are required to be worn by pilots who intentionally perform maneuvers that exceed a bank of sixty degrees relative to the horizon or a nose-up or nose-down attitude of thirty degrees relative to the horizon (per FAR 91.307 (c)). Operationally, this means that all aerobatic pilots wear parachutes. Additionally, some non-aerobatic pilots choose to wear parachutes to provide an extra layer of security in the event of an emergency.

A change to the required parachute-packing interval would result in one less inspection and repacking interval per year without a decrease in the effective level of safety. At an operational level this would result in a decrease in the financial burden required to maintain a parachute while ensuring the current level of safety is met.

### **Summary**

AOPA supports this proposed regulatory change as it works to ensure the safety of general aviation pilots and would incorporate appropriate standards for new technology into the regulations.

Sincerely,



Leisha Bell  
Manager  
Regulatory Affairs