



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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September 17, 2007

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

Re: Docket No. FAA-2007-28433 Airworthiness Directives; Cessna Aircraft Company, Models 172, 182 and 206 Series Airplanes

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) Airworthiness Directives; Cessna Aircraft Company, Models 172, 182 and 206 Series Airplanes Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Thursday, July 19, 2007.

Specifically, AOPA objects to the inclusion of the third and fourth seats of the Cessna 206 in this airworthiness directive (AD) as these are not crew seats and do not directly contribute to the safety of flight issue outlined in the AD.

AOPA Requests FAA Exempt Non-Crew Seats

The FAA proposes an airworthiness directive for the Cessna 172, 182 and 206 model aircraft that would require modification of the seat attach brackets.

Explanation of proposed airworthiness directive: The proposed AD is a result of reports of the seat base/back attach bracket failing where it is welded to the seat base in Cessna 172, 182 and 206 model aircraft. If the bracket fails the seat could unexpectedly collapse while in flight. This unexpected movement could cause the pilot to lose control of the aircraft during flight.

The AD would require that the affected seats be removed and fitted with a bracket modification kit. The proposed AD would affect approximately 1,556 aircraft and would apply to the crew seats in the 172 and 182 and four seats in the Cessna 206.

AOPA recommendation: The FAA should exempt all non-crew seats from this AD. The third and fourth seats for the Cessna 206 are not crew seats and therefore should not be included in the proposed AD.

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The proposed AD states, "We (FAA) are proposing this AD to prevent failure of the seat base/back attach brackets, which could result in the seats collapsing backwards during flight with consequent loss of control." AOPA recognizes the FAA's authority to issue airworthiness directives to correct unsafe conditions. However, modifying the third and fourth seats of the Cessna 206 at an estimated cost of just under \$1,000 per aircraft does not directly address the safety of flight issue raised in the proposed AD.

The true safety of flight issue is not the possible collapse of the seat, but the loss of control that could follow should the pilot either grab the flight controls as the seat is collapsing or be unable to reach the flight controls after the collapse. The third and fourth seats of the Cessna 206 are not crew seats and therefore pose little or no risk that a possible collapse could cause the pilot to lose control of the aircraft. The third and fourth seats of the Cessna 206 are appropriately addressed in Cessna Safety Bulletin No. SB-7-25-04 issued earlier this year and should not be included in the AD.

Summary

AOPA believes that loss of control in flight is a serious issue and appreciates the FAA's efforts to ensure the continued safety of the general aviation fleet. AOPA looks forward to a solution that addresses the safety of flight issue but does not impose additional requirements on aircraft owners that do not directly address the potential loss of control of the aircraft by the pilot.

Sincerely,



Robert Hackman
Senior Director
Regulatory Affairs