



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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

October 11, 2007

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

**Re: Docket No. FAA-2007-28478; Directorate Identifier 2007-CE-057-AD;
Airworthiness Directives; Taylorcraft A, B, and F 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; Taylorcraft A, B, and F Series Airplanes Final Rule with request for comments published in the Federal Register on Monday, August 13, 2007.

To decrease the burden on the pilot community, maintain the level of safety sought in the AD and ensure that the final airworthiness directive (AD) resulting from this comment period appropriately addresses the issue of corrosion found within struts installed on Taylorcraft airplanes. AOPA requests that the FAA actively solicit and evaluate alternate means of compliance (AMOCs) from industry, including from type clubs and current STC holders for Taylorcraft aircraft. Additionally, AOPA requests that the FAA revisit the timeframe specified for the initial eddy current and ultrasound inspection currently listed in the AD.

AOPA Requests FAA Solicit and Evaluate All Alternate Means of Compliance

The FAA proposes an airworthiness directive for Taylorcraft A, B, and F series airplanes that require initial and subsequent repetitive inspections of the wing struts for corrosion until the struts are replaced.

Explanation of proposed airworthiness directive: The proposed airworthiness directive is a result of reports of moderate to severe corrosion on the wing struts of Taylorcraft A, B, and F series aircraft. According to the AD, the Taylorcraft Company and individual Taylorcraft owners reported corrosion in the wing struts that was severe enough to require the replacement of the struts. Corrosion can weaken the wing struts resulting in an in-flight failure of the struts. This failure could cause an in-flight wing separation and loss of control of the aircraft while in flight.

The proposed AD would require Taylorcraft owners to visually inspect the front and aft wing struts on both wings within five hours of time-in-service from the publication date of the AD and a follow up inspection using either eddy current or ultrasound. Under the AD repetitive eddy current or ultrasound inspections are also required every 24 months. The terminating compliance event for the AD is strut replacement with a sealed strut.

AOPA recommendation: The FAA should strongly consider and evaluate all alternate means of compliance submitted to this 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 existing Taylorcraft aircraft and requests that the FAA actively solicit and evaluate AMOCs for this AD. AMOCs grant a degree of flexibility to aircraft owners and therefore mitigate some of the burden of compiling with an AD while still addressing the underlying safety concern.

In the case of Taylorcraft, other companies currently produce FAA approved wing struts under a parts manufacture approval (PMA) for Taylorcraft aircraft. Absent of the existing AD, this has provided Taylorcraft owners options when deciding to replace the wing struts. Companies with current PMA approval to produce wing struts for Taylorcraft series aircraft would be good candidates to apply for an AMOC for this AD; allowing Taylorcraft owners the same, or more, wing strut replacement options as they had before this AD was published. If an AMOC for the wing strut is approved, it could alleviate some of the financial burden this AD has placed on individual Taylorcraft owners while ensuring safety of the fleet.

AOPA has heard from many members who have recently refurbished their aircraft. The refurbishment included replacing all four wing struts with PMA parts. Approving an AMOC for PMA wing struts would alleviate the burden on these owners who, under the existing AD, would have to replace these new wing struts in order to be in compliance with this AD.

The FAA should also be actively soliciting and evaluating AMOCs for the eddy current and ultrasound inspection outlined in the AD. Due to the scarcity of qualified eddy current and ultrasound inspection personnel and repair stations, Taylorcraft owners will experience a delay when sending their wing struts out for inspection, resulting in prolonged periods where the aircraft is not available for use. AMOCs for alternate inspection methods, that would not degrade the quality of the results, such as radiography or borescoping, could increase the availability of qualified inspection personnel and decrease the delay that owners will experience while waiting for the inspection.

U.S. Department of Transportation

Page 3

October 11, 2007

AOPA recommendation: The FAA needs to consider extending the interval for the initial eddy current or ultrasound inspection on aircraft where no corrosion was found during the initial visual inspection.

As the AD is currently written, if no corrosion is found on the strut during the visual inspection, the eddy current or ultrasound inspection must be completed within three months of the publication of the AD. AOPA requests that the FAA consider extending this interval to 24 months, with subsequent repetitive inspections every 24 months. While corrosion was found in the wing struts of aircraft in the Taylorcraft fleet, no service difficulty reports (SDR) were made and no accidents or reported incidents have resulted from a failure of the wing strut. Given the lack of reported data in the SDR database and lack of incident and accident history, AOPA does not believe the aggressive three-month timeframe is warranted on struts that pass the initial visual inspection.

Summary

AOPA appreciates the FAA's efforts to ensure the safety of the general aviation fleet and looks forward to the inclusion of AMOCs in this AD and the extension of the initial eddy current and ultrasound inspection timeframe. The association believes this will allow the more than 2,600 Taylorcraft owners affected by this AD to appropriately choose the compliance method and timeframe that causes the least amount of burden while maintaining the level of safety sought in the AD.

Sincerely,



Leisha Bell
Manager
Regulatory Affairs