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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: FAA-2008-0367: Directorate Identifier 2007-CE-089-AD; Airworthiness Directives; Viking Air Limited Models DHC-6-1, DHC-6-100, DHC-6-200, and DHC-6-300 Airplanes**

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 415,000 pilots. AOPA's mission is to effectively serve the interests and needs of its members as aircraft owners and pilots 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, AOPA is the largest civil aviation organization in the world.

AOPA submits the following comments to the Federal Aviation Administration's (FAA) Airworthiness Directives; Viking Air Limited Models DHC-6-1, DHC-6-100, DHC-6-200, and DHC-6-300 Airplanes Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Monday, March 31, 2008.

AOPA supports the FAA's efforts to establish protocols for detecting and removing corrosion in older aircraft. For some aircraft a proactive corrosion inspection and removal program may be very appropriate. However, airworthiness directives (ADs) are issued to address a specific existing issue that has negatively affected the safety of a make and model of aircraft. The FAA has included no evidence of an existing problem within the DHC-6-1, DHC-6-100, DHC-6-200, and DHC-6-300 fleet along with the proposed AD.

## AOPA objects to the proposed AD

***The FAA proposes an airworthiness directive for the DHC-6-1, DHC-6-100, DHC-6-200, and DHC-6-300 model aircraft that would require "corrosion tasks" to be completed as outlined in Bombardier's Corrosion Prevention and Control program.***

Explanation of proposed airworthiness directive: The proposed AD would require that aircraft owners develop a schedule for completing the initial and recurrent corrosion inspections as outlined in Bombardier's Corrosion Prevention and Control program

within 90 days of the publication of the final AD. Following the development of the inspection schedule, all of the inspections outlined in Bombardier's Corrosion Prevention and Control program should be completed (a total of seven inspections) to determine the level of corrosion in the aircraft. The timeline for completing the initial inspection varies from 15 to 63 months based on the aircraft's serial number. Any corrosion found during the initial or repetitive inspections will have to be addressed, before further flight of the aircraft.

*AOPA recommendation: AOPA opposes broad-based fleet-wide airworthiness directives to address corrosion related issues such as this one. Instead AOPA supports a more focused approach that takes aircraft maintenance and usage into account; instead of an AD based solely on age.*

The proposed AD states, "Service experience indicates that as aircraft become older, they are more likely to exhibit indications of corrosion." Unfortunately, the general premise of this proposed AD is true for any vehicle or structure made of metal. Because of this AOPA feels the proposed AD is too broad and should be limited to aircraft within the DHC-6 fleet that have other factors that could induce the growth of corrosion and have a defined history of corrosion that has negatively affected the safety of flight.

While the intent of this proposed AD is clear, AOPA wants to ensure that the FAA is aware of the industry's ongoing efforts to educate the general aviation (GA) community about corrosion and fatigue related issues. AOPA also wants to ensure that the FAA does not apply or approve broad-based fleet-wide ADs to address these issues when corrosion may, in reality, be limited to a very small number of aircraft based on how they were used, flown, and maintained.

Corrosion is a major component of maintenance and aircraft structural concerns surrounding "aging aircraft" issues. To help aircraft owners and operators understand the affect that corrosion and fatigue can have on their aircraft, AOPA released a free online course titled *Aging Aircraft* that discusses the issues surrounding corrosion and introduces the general aviation community to the need to properly maintain the aircraft structure; a concept that is relatively new in the general aviation community. *Since its release in October 2007, well over14,000 people have complete the hour-long course.*

Since it is sometimes difficult to appropriately segment aircraft based on maintenance history, type of usage, etc. for the purposes of accurately issuing an AD, AOPA strongly supports outreach efforts that educate the flying community about the possible affects of corrosion and fatigue and the appropriate actions that aircraft owners can take to keep their aircraft airworthy.

**Summary**

AOPA looks forward to continued industry involvement, education, and research in the issue of corrosion and "aging aircraft" and the related maintenance issues. AOPA challenges the FAA to consider the role that specific use patterns and maintenance practices play on corrosion related safety issues before requiring fleet-wide ADs to address safety issues that may be exacerbated by aircraft use, and not caused solely by a type design feature or calendar age.

Sincerely,

Leisha Bell
Manager
Regulatory Affairs