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Mr. Scott Horn  
FAA Small Airplane Directorate  
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Mr. Horn:

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 416,000 pilots. AOPA's mission is to effectively represent the interests of its members as aircraft owners and pilots concerning the economy, safety, utility, and popularity of flight in general aviation (GA) aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

On Wednesday, May 13, 2009 the Federal Aviation Administration (FAA) published a final airworthiness directive (AD) on Cessna 150 and 152 series airplanes. The AD requires aircraft owners or operators to install a rudder modification kit or placard stating "intentional spins and other acrobatic/aerobatic maneuvers prohibited per AD 2009-10-09" within 100 hours of time in service or at annual.

The type certificates for the Cessna 150 and 152 models affected by this AD are more than 30 years old. Currently more than 17,000 of these aircraft are on the registry and this aircraft has an exceptional safety record. At many flight schools Cessna 150s and 152s are used for spin training leading to spin recovery proficiency and the flight training endorsements required under FAR 61.183(i), a prerequisite to becoming an FAA certificated flight instructor.

Given the long safe history of the Cessna 150 and 152 within the fleet AOPA feels that it is appropriate for the FAA to offer a detailed background on how the FAA determined these aircraft had a design flaw. The effective date of the AD should be moved back 30 days to allow for the FAA to provide this explanation to the industry and for aircraft owners to decide how they would like to comply. The FAA also needs to consider ways to decrease the impact of this AD on the 17,000 aircraft affected. To this end, AOPA asks that aircraft owners and mechanics be allowed to fabricate the placard and perform the required airplane flight manual change and the associated maintenance log entry described in compliance option 1 in the AD.

When taking continued airworthiness actions on aircraft that comprise a large proportion of the fleet the FAA should work to ensure the AD process is transparent. In these cases the FAA should initiate outreach efforts to the aviation associations and type clubs educating and informing the industry on the complete history of the AD, changes in FAA assumptions, and how the FAA made the determination that an AD was necessary.

Sincerely,



Craig J. Spence  
Vice President  
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