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January 20, 2015

US Department of Transportation  
Docket Management Facility  
1200 New Jersey Avenue SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590

**RE: Petition for exemption; Docket No. FAA-2014-0935**

Dear Sir or Madam,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following letter of support regarding Terrafugia's petition for exemption from certain sections of 14 Code of Federal Regulations (CFR) Parts 21, 43, and 61.

Terrafugia seeks an exemption to certify the Terrafugia Transition street-legal airplane under Light Sport Aircraft (LSA) requirements. Specifically, Terrafugia seeks an increase of 480 pounds to the Light Sport Aircraft weight limit to accommodate additional safety measures required to meet federal guidelines and a corresponding increase to the LSA stall speed limitation. According to the petition, these exemptions should increase the safety margin for the Terrafugia Transition and meet the burden of demonstrating a public benefit. AOPA supports the granting of this exemption.

The Terrafugia Transition aircraft is uniquely subject to both FAA and National Highway Traffic Safety Administration (NHTSA) regulations. The additional safety measures required to meet NHTSA's Federal Motor Vehicle Safety Standards (FMVSS) increase the weight and stall speed beyond the limitations for LSA. Exempting Terrafugia's Transition from the arbitrary LSA weight limit will demonstrate the FAA's willingness to move towards performance-based limitations.

The additional weight required by enhanced safety features increases the demonstrated stall speed beyond the LSA 45 knot limit. Unfortunately, the unique nature of the Terrafugia Transition and limitations on maximum road dimensions eliminate the possibility of increasing the wing area to produce additional lift, thus the need for an increased stall speed. It should be noted that according to the petition, even at this increased stall speed, significant stall margin is available to pilots on landing and takeoff.

The LSA category was created in part to reinvigorate the general aviation industry, while supporting the FAA's goal to increase the safety of the flying public. By design, the Transition is poised to contribute to the growth of the general aviation market, to introduce innovation into general aviation, and to provide unprecedented safety to the pilots and passengers of the Transition.

The realization of the safety and public interest benefits presented here rely on the Transition meeting light sport certification requirements. While other certification options exist, they do not facilitate the innovation, responsiveness, and market growth that is supported by LSA. Both Primary Category aircraft certification and the requirement of a Private Pilot Certificate add detrimental burdens and serve as impediments to introducing the additional safety benefits to the public.

AOPA appreciates the FAA's consideration of this letter of support for Terrafugia's petition and urges the agency to grant the exemption.

Sincerely,

A handwritten signature in black ink that reads "Tom Kramer". The signature is written in a cursive, slightly slanted style.

Thomas E. Kramer  
Manager, Regulatory Affairs