



February 6, 2018

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

RE: FAA Airworthiness Directive; Piper Aircraft, Inc. Models PA-28-140, PA-28-150, PA-28-151, PA-28-160, PA-28-161, PA-28-180, PA-28-181, PA28-236, PA-28-201T, PA-28R-180, PA-28R-200, PA-28R-201, PA-28R-201T, PA-28RT-201, and PA-28RT-201T airplanes. Docket No. FAA-2018-0015

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, offers the following comments and recommendations on the Federal Aviation Administration's (FAA) Final Rule, adopting a new airworthiness directive (AD) for various Piper Aircraft, Inc. airplanes.

On January 23, 2018, the FAA published a Final Rule; request for comments for an AD which requires inspecting the fuel tank selector cover to verify the left and right placards are located in the correct positions and replacing those which are discovered to be incorrect. AOPA first became aware of this issue in May, 2017 when the agency circulated an Airworthiness Concern Sheet (ACS), requesting information and comments. In response, AOPA published a story on its website and encouraged members and affected aircraft owners to contact us with any information and/or comments. The ACS noted one operator that reported a fuel selector cover with the left and right fuel tank placards reversed and noted several spare parts that were found in the same condition.

AOPA story - <https://www.aopa.org/news-and-media/all-news/2017/may/30/reversed-fuel-selector-placards-prompt-faa-concern>

Although AOPA acknowledges the safety risk improper fuel selection and management has, we are unaware of any accidents or incidents that have occurred as a result of improper placards. Many of the affected fleet have been in operation for decades and the owner/operator has likely verified the accuracy of the fuel selector and corresponding tank through fuel gauge readings over hundreds, if not thousands of hours.

Furthermore, AOPA questions the urgency and need to go direct to a Final Rule without issuing a Notice of Proposed Rulemaking (NPRM) and affording the public a comment period. In light of one report, no accidents, and an ACS issued nearly a year ago, we were puzzled to see the agency select a Final Rule; request for comments as its corrective action.

Lastly, with the simple nature of the inspection, AOPA contends that aircraft owners/operators are capable and should be allowed to perform the initial inspection. The agency has a long history of allowing such actions (e.g. AD 2014-23-16). Due to the short timeframe for compliance and an estimated affected fleet of 17,957, permitting aircraft owners to perform the initial inspection will ensure safety, timely compliance, and appropriately limit costs.

For the reasons stated above, AOPA recommends the FAA withdraw the AD and issue a new, proposed AD which would allow aircraft owner/operators to perform the initial inspection.

AOPA appreciates the opportunity to provide comments and stands ready, willing, and able to assist the FAA in any way possible to best mitigate the airworthiness concern while maintaining the safety of the affected fleet.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Oord", is positioned above the typed name and title.

David J. Oord
Senior Director, Regulatory Affairs