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April 6, 2020

Docket Operations, M-30  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Room W12-140, West Building Ground Floor  
Washington, DC 20590-0001

**Re: FAA Docket Number FAA-2020-0156; Airworthiness Directive; Textron Aviation, Inc. (Type Certificate Previously Held by Cessna Aircraft Company), Models 210G, T210G, 210H, T210H, 210J, T210J, 210K, T210K, 210L, T210L, 210M and T210M airplanes**

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation membership association representing individuals who collectively operate 85% of all general aviation aircraft in the United States. AOPA respectfully submits this comment in response to the Airworthiness Directive (AD) effective March 9, 2020 involving carry-thru spars on certain Textron Aviation, Inc. Cessna 210 models.

On February 21, 2020, the FAA published a final rule, with request for comments, for an AD to require visual and eddy current inspections of the carry-thru spar lower cap of certain Textron Aviation, Inc. Cessna 210 model aircraft. The history of this AD resulted from a fatal accident involving a highly modified Cessna 210 in Queensland, Australia.<sup>1</sup> According to the Australian Transport Safety Bureau's (ATSB) preliminary report and recent updates, on May 26, 2019, a Cessna 210M crashed during an aerial geological survey flight while operating at 200 feet above ground level.<sup>2</sup> It was discovered that the right wing had separated from the aircraft and subsequent examination found fatigue cracking of the spar "carry-through." The aircraft had a STC for the installation of integral wing tip fuel tanks and a non-standard engine and propeller installation. The aircraft had accumulated 12,174 hours, with about 6,000 hours being used exclusively as a geological survey aircraft with full fuel. A final report is not expected until the third quarter of 2020.

The ATSB informed the NTSB of its initial findings on May 31<sup>st</sup>, 2019. Subsequently, the FAA issued an Airworthiness Concern Sheet (ACS) on June 27, 2019 and received reports of at least 194 various Cessna 210 models with spar carry-thru corrosion. The FAA also reviewed and supported Textron's Service Letters SEL-57-06 (and Revision 1) and SEL-57-08 (and Revision 1).

The FAA published its final rule on February 21, 2020 that requires visual and eddy current inspections of the carry-thru spar lower cap to over 1,500 Cessna 210 model aircraft. This final

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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2020-02-21/pdf/2020-03276.pdf>

<sup>2</sup> [https://www.atsb.gov.au/publications/investigation\\_reports/2019/aair/ao-2019-026/](https://www.atsb.gov.au/publications/investigation_reports/2019/aair/ao-2019-026/)

rule is published less than one year before the date of the Australian accident, and before the final ASTB report has been published.

AOPA has heard from several members regarding concerns of the scope, cost and limited data available for this AD. On behalf of the over 300,000 members of AOPA and operators of over 1,500 Cessna 210 aircraft impacted by this AD, AOPA respectfully requests the FAA to consider the following modifications to the AD as described below.

### **Retract the AD until further data is obtained**

Due to the highly modified Cessna 210M that crashed in Australia, it is difficult to compare this single aircraft and the operation it flew to the thousands of various Cessna 210 models throughout the U.S. Although over 100 Cessna 210 models have been discovered to have reported corrosion, there is a lack of evidence to suggest a correlation between the Australian accident and corrosion discovered in unrelated aircraft. Nor is there evidence to show how corrosion has occurred over a period of time. AOPA requests the FAA retract this AD until further data is gathered beyond what has been reported by individual operators. At a minimum, it would be prudent to delay this AD until the final ATSB report has been released.

### **Compliance with the Textron Aviation Mandatory Single Engine Service Letter(s) is adequate**

Textron's Service Letters SEL-57-06 (and Revision 1) and SEL-57-08 (and Revision 1) were all approved by the FAA and provide for visual inspection of the impacted area of the carry-thru spar. Many aircraft have already complied with these Service Letters and to AOPA's knowledge, there has been no reported incidents of failed spars. AOPA recommends the AD be modified to allow an operator to meet the requirements of this AD through completion of these Service Letters. Alternatively, amend the AD to provide continued inspections on a scheduled basis to inspect for corrosion and to add corrosion protection on an as needed basis.

### **Remove the eddy current inspection requirement**

There is currently no data available to demonstrate how an eddy current inspection will be used to successfully show enough corrosion damage to cause a catastrophic failure. In addition, the cost and availability to obtain an eddy current inspection varies greater than is depicted in the AD. AOPA has received input from operators that hourly rates can be in the hundreds of dollars and can take several weeks to schedule.

### **Extend the time to comply with the AD to 12 months**

AOPA appreciates the FAA's consideration of the impact of the current COVID-19 pandemic and its decision to extend the compliance date to September 9, 2020. However, due to the significant impact of social distancing and stay-at-home restrictions across the U.S., it will be a challenge to schedule and complete the required elements of this AD, even within this time frame. In addition, the availability of replacement spars is currently little, to none. It is imperative that appropriate time be made available to ensure this part is available before the

possibility of over 1,500 aircraft being grounded. Extending the compliance date to 12 months will align with the Textron SEL.

AOPA appreciates the FAA's consideration of our comment on this important issue. With the average age of single-engine piston aircraft in the U.S. now over 46 years,<sup>3</sup> AOPA acknowledges the risks of aging aircraft and fatigue will have on the future continued operational safety of the general aviation fleet. We stand ready to work with the FAA, affected aircraft owners, type clubs, and manufacturers to manage that risk. Please feel free to contact me at 202-737-7950 if you have any questions.

Sincerely,



Christopher J. Cooper  
Director, Regulatory Affairs

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members 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 including several thousand UAS operators, AOPA is the largest civil aviation organization in the world.

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<sup>3</sup> [https://gama.aero/wp-content/uploads/GAMA\\_2019Databook\\_Final-2020-03-20.pdf](https://gama.aero/wp-content/uploads/GAMA_2019Databook_Final-2020-03-20.pdf)