



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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

Re: Docket No. FAA-2007-28434; Directorate Identifier 2007-CE-053-AD

Airworthiness Directive on Hawker Beechcraft Corporation (Type Certificates No. 3A15 and No. 3A16 Previously Held by Raytheon Aircraft Company) F33 Series and Models G33, V35B, A36, A36TC, B36TC, 95-B55, D55, E55, A56TC, 58, and G58 Airplanes and Raytheon Aircraft Company Models 58P, 58TC, and 77 Airplanes

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 members, or two-thirds of the nation's general aviation pilots, submits the following comments to the Federal Aviation Administration's (FAA) Airworthiness Directives; Hawker Beechcraft Corporation F33 Series and Models G33, V35B, A36, A36TC, B36TC, 95-B55, D55, E55, A56TC, 58, and G58 Airplanes and Raytheon Aircraft Company Models 58P, 58TC, and 77 Airplanes Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Friday, July 6, 2007.

AOPA believes the proposed airworthiness directive (AD) is an overreaction to the failure of circuit breakers on specific electric components of the 58 Baron. The proposed AD should only affect the airplane make, model and electric components that experienced a circuit breaker failure during normal operations.

AOPA Requests FAA Limit the Scope of the Proposed AD

The FAA proposes an airworthiness directive for Hawker Beechcraft F33 Series and Models G33, V35B, A36, A36TC, B36TC, 95-B55, D55, E55, A56TC, 58 and G58 Airplanes and Raytheon Aircraft Company Models 58P, 58TC, and 77 airplanes that would required the replacement of certain circuit breakers due to overheating.

Explanation of proposed airworthiness directive: The proposed airworthiness directive is a result of an airworthiness concern sheet (ACS) issued by the Wichita Aircraft Certification Office (ACO) in 2004. Attached to the ACS were four service difficult

reports (SDRs). All of the SDRs submitted with the ACS were for the 58 Baron. Three of the four reports were for a smell in the cockpit, which was traced back to an overheated circuit breaker. Two of the SDRs reported that the effected electrical component could not be turned off due to overheating of the circuit breaker. In all cases, once the circuit breaker was replaced the aircraft was successfully returned to service.

According to the ACS, eight circuit breakers were removed from the 58 series Barons that had reported a problem with a circuit breaker and had submitted an SDR on the issue. Raytheon and the FAA tested these circuit breakers. Of the eight circuit breakers tested, three “got very hot to the touch and one eventually produced smoke, and could not be selected off.”

The proposed AD would apply to toggle switch circuit breakers with part numbers 35-380132-1 through 35-380132-53. While these circuit breakers are used on various electrical components in the aircraft, the SDRs were submitted for problems with the landing light, taxi light and prop heat only.

Compliance with the proposed AD would require aircraft owners to replace the listed circuit breakers within twelve months of the effective date of the final AD. The estimated compliance cost to aircraft owners and operators is between \$2 million and \$30 million, depending on the number of breakers that would require replacement. Per aircraft, compliance with this proposed AD would vary from \$400 to \$3,000.

AOPA recommendation: The FAA should limit the scope of this proposed AD to the aircraft make and models that have actually experienced a circuit breaker failure during normal operations. This would limit the proposed AD to the 58, 58G, 58P and 58TC. In addition, the FAA should also limit this AD to the electric components that experienced a failure under normal operating conditions. According to the ACS submitted in 2004, this would limit the AD to the landing and taxi lights and prop heat.

AOPA strongly objects to the proposed AD that would affect nearly 11,000 aircraft and multiple aircraft models when there is no operational data to suggest the named circuit breakers fail in aircraft other than the Baron. In addition, there is no operational data to suggest the wide spread failure of circuit breakers tied to low draw electric components. The SDRs cited in the ACS were on circuit breakers tied to the landing and taxi lights and the prop heat – all high-draw electric components.

While AOPA appreciates the FAA’s efforts to ensure the continued safety of the general aviation fleet and its pilots, the proposed AD is an overreaction and inappropriate for the issue at hand. The presents of smoke in the cockpit can be a serious safety matter, but the realty of an overheating circuit breaker causing a full-blown in-flight emergency is unlikely. To appropriately address this issue, the FAA should ensure that the pilot

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operating handbooks of all the models listed in this proposed AD have a checklist that addresses smoke in the cockpit. This will ensure that pilots flying these aircraft have the appropriate information at hand should smoke be present in the cockpit for any reason. Proposing an AD that could cost \$30 million is not an appropriate response to this issue.

Narrowing the scope of this proposed AD to the Beechcraft 58 and G58 airplanes and Raytheon Aircraft Company models 58P and 58TC airplanes would directly address the operational failure of the circuit breakers listed in the AD without expanding the scope of the AD to aircraft that have no record of in-flight operational failures of the circuit breakers. Limiting the proposed AD further to only apply to high-draw electric components would directly address the concerns of the FAA with regard to circuit breaker failure and smoke in the cockpit.

Summary

Based on the information provided in the airworthiness concern sheet, service difficult reports and the proposed AD, AOPA believes the scope of the proposed AD should be narrowed to only those aircraft models and electric components that have experienced an operational failure of the circuit breaker during normal operation. If the FAA feels further steps are necessary to ensure the continued safe operation of the aircraft models listed in the proposed AD, the FAA should ensure that the pilot's operating handbook for each of the models listed in the proposed AD contains procedures for either electrical fire or smoke in the cockpit.

Sincerely,



Leisha Bell
Manager
Regulatory Affairs