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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-2008-0331; Directorate Identifier 2008-CE-009-AD  
Airworthiness Directives; Cessna Aircraft Company, Models 208 and 208B  
Airplanes**

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 415,000 pilots. AOPA's mission is to effectively serve the interests and needs of its members as aircraft owners and pilots to 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, AOPA is the largest civil aviation organization in the world.

AOPA submits the following comments to the Federal Aviation Administration's (FAA) Airworthiness Directives; Cessna Aircraft Company, Models 208 and 208B Airplanes Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Monday, March 17, 2008.

AOPA believes the proposed AD is premature and that the recently issued Cessna service bulletin (SB) appropriately addresses the maintenance issues described in the proposed AD. The FAA needs to allow more time for the SB to be appropriately distributed to the aviation industry and for the industry to take action.

**AOPA Objects to the Proposed AD**

***The FAA proposes an airworthiness directive for the Cessna 208 and 208B model aircraft that would require inspection, and possible replacement, of the left and right wiring bundles.***

Explanation of proposed airworthiness directive: The proposed AD is a result of reports of chafed wiring bundles in the right and left wings of the Cessna 208B caused by the improper installation of wiring bundle support hardware. The affected wiring bundles contain the wiring for the auto-control wing de-ice system, fuel quantity indicators and low fuel annunciation systems. Failure of these wiring bundles could result in the loss of

both the low fuel annunciators, auto-control wing de-ice systems and loss of accurate fuel quantity indications.

The AD would require the inspection of the affected wiring bundles and require that any damaged or loose wires be replaced, repaired, or properly secured. According to the AD, over 500 aircraft would be affected.

*AOPA recommendation: The FAA should allow additional time for aircraft owners and operators to comply with the service bulletin issued by Cessna in February 2008. AOPA believes that an SB is an effective way to correct a potential issue with the wiring bundles in the Cessna 208 fleet.*

Service bulletins are created and distributed by the aircraft manufacturer to alert aircraft owners to maintenance related issues. SBs can be issued to alert aircraft owners of potential or existing maintenance issues or to alert aircraft owners of a modified inspection protocol.

On February 4, 2008, Cessna issued service bulletin CAB08-02 that described the recommended wiring bundle inspection protocol and time intervals for the inspection. The SB outlined the recommended course of action should wiring bundles with damage or loose wires be detected. This SB was distributed to the owners of Cessna 208 aircraft and others with a subscription to Cessna's SBs.

Also, on February 4, 2008 the FAA sent out an airworthiness concern sheet to industry type clubs and aviation associations asking for input that could affect the airworthiness actions taken by the FAA. The FAA asked for input regarding Cessna's SB, any service difficulty reports or any additional comments on the airworthiness concern sheet.

AOPA commented on the airworthiness concern sheet. The association's comments stated that any FAA action was unwarranted until the SB had time to be distributed to Cessna 208 aircraft owners and mechanics. If, after a reasonable amount of time, the SB did not appropriately address the safety concern a special airworthiness information bulletin (SAIB) or the FAA could issue an AD.

The FAA decided to issue a proposed AD only eight days after the airworthiness concern sheet comment period closed. AOPA feels this is an inappropriate and premature action.

Additionally, AOPA believes that many Cessna 208 owners and operators will comply with the SB, making any further action by the FAA unnecessary. The Cessna 208 is often used by commuter and on demand aircraft service operators, which are governed by 14 CFR Part 135. Under this section of the regulations each certificate holder must have a maintenance plan that is approved by the FAA. Many certificate holders opt to follow

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the aircraft manufacturers maintenance plan and comply with all SBs issued by the manufacturer. Many Cessna 208 aircraft will have to comply with the SB per their FAA-approved maintenance plans. For these aircraft the issuance of an AD is redundant.

**Summary**

The association believes that issuing an AD on the wiring bundles of the Cessna 208 is premature. The FAA needs to allow for the recently issued Cessna SB to be distributed and disseminated among Cessna 208 owners and mechanics. If the SB fails to appropriately address the maintenance issue, the FAA can then issue an SAIB or AD.

Sincerely,



Leisha Bell

Manager

Regulatory Affairs