



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

August 13, 2008

Mr. Mark James
Small Airplane Directorate, ACE-111
901 Locust, Room 301
Kansas City, MO 64106

Re: AC 23-27 Parts and Materials Substitution for Vintage Airplanes

Dear Mr. James:

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 415,000 pilots. Representing two thirds of the pilots in the United States, AOPA is the largest civil aviation organization in the world. Our mission is to effectively serve the interests of members as pilots or aircraft owners to establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft.

AOPA submits the following comments on the Federal Aviation Administration's (FAA) Advisory Circular AC 23-27 Parts and Materials Substitution for Vintage Airplanes.

AOPA supports the efforts of the FAA, including this AC, to keep vintage general aviation aircraft flying. We ask that the FAA regularly review and continue to expand information contained in this AC and consider the development of an online database in which critical information such as acceptable parts substitutions can be maintained, updated, and accessible in real time by the vintage aircraft community.

Summary of AC 23-27

This AC provides guidance for substantiating parts or materials substitutions to maintain the safety of old or out of production general aviation airplanes. This AC also provides guidance about the data required to gain FAA approval for making these substitutions. The data in this AC may be used as "approved" data for substantiating parts or materials substitutions to vintage aircraft. The appendices include examples of parts substitutions and guidance on recording minor alterations through logbook entries. These guidelines will help owners avoid having to obtain a field approval for like substitutions on subsequent airplanes.

Regularly Review and Expand Vintage Aircraft Material

AOPA recommends that this AC and others addressing vintage aircraft be reviewed and updated on regular intervals by the FAA. With each review the FAA should continue to work in conjunction with industry and the owners of vintage aircraft to address changing

Mr. Mark James
Page 2
August 13, 2008

concerns and the ever expanding market of new and replacement parts suitable for substitution. Acceptable part substitutions are critical to ensure vintage aircraft remain airworthy and safe.

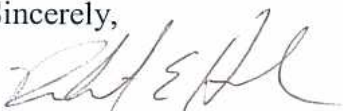
Creation of Online Approved Parts Substitution Database

AOPA also recommends that the FAA supplement this advisory circular by developing an online database of approved parts substitutions to support the owners of vintage aircraft. This database could be managed and revised as needed without the full review process required for advisory circulars and address newly approved parts substitutions in a timely manner while being accessible in real time by the vintage aircraft community. AOPA and the vintage aircraft community could work with the FAA to provide the data needed to populate the database and develop new approvals to benefit the safety and viability of the vintage fleet. Making the approved parts substitution information available via a properly managed and regularly updated database would provide information that could significantly increase the viability and maintain the safety record of vintage aircraft.

Summary

AOPA believes that efforts such as this AC and the expansion and regular review of information available to the vintage community will help continue to keep vintage aircraft as a viable part of the general aviation community. We look forward to working with the FAA on future initiatives to address the needs and concerns of the vintage aircraft fleet.

Sincerely,



Robert E. Hackman
Senior Director
Regulatory Affairs