



421 Aviation Way  
Frederick, Maryland 21701

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

[www.aopa.org](http://www.aopa.org)

January 5, 2010

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

**Re: Docket No. FAA-2009-1015; Directorate Identifier 2009-CE-039-AD; Airworthiness Directives; Piper Aircraft, Inc. PA-28, PA-32, PA-34 and PA-44 Series 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 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, AOPA is the largest civil aviation organization in the world.

AOPA submits the following comments to the Federal Aviation Administration's (FAA) Airworthiness Directives; Piper Aircraft, Inc. PA-28, PA-32, PA-34 and PA-44 Series Airplanes Notice of Proposed Rulemaking (NPRM) published in the Federal Register on Friday, October, 30, 2009.

AOPA believes the FAA needs to work diligently to refine the number of aircraft affected by this proposed AD. While failures of the control wheel shaft have occurred in the fleet, they are incredibly rare. Additionally, the FAA needs to appropriately address variations in the Piper fleet affected by the proposed AD in the cost of compliance section.

**AOPA is requesting that the FAA work to narrow the scope of the proposed AD and update the cost of compliance based on field experience**

***The FAA proposes an airworthiness directive for Piper aircraft models PA-28, PA-32, PA-34 and PA-44 that would require inspection, and possible replacement, of the control wheel shaft.***

Explanation of proposed airworthiness directive: The proposed AD is a result of two reports of control wheel shafts incorrectly drilled at Piper. Both aircraft were PA-34-220T. One misdrilled control wheel assembly was found during inspection. The other resulted in the separation of the right-side control wheel.

The AD would require the inspection of the control wheel assemblies on approximately 41,928 aircraft. The FAA estimates each inspection would take 30 minutes and cost \$40 per aircraft.

*AOPA recommendation: The FAA needs to diligently work with Piper and the industry to limit the scope of this AD and ensure the cost of compliance is accurately calculated.*

The FAA needs to work with Piper to try to limit the scope of this AD. Inspecting 42,000 aircraft is a big job and cost for the industry to bear. Can Piper and the FAA historically analyze the control yoke assembly process and determine a time period when assembly errors were most likely to have occurred and limit the AD to aircraft manufactured during that narrower timeframe?

Also, the FAA needs to recognize that the cost of compliance calculation used in the proposed AD is overly simple. The current calculation given for the inspection of an aircraft is 30 minutes at \$80 an hour for labor. This results in an inspection cost of \$40 per airplane.

AOPA has heard from Piper owners that would be affected by this AD that the inspection is not simple and can take hours, if it can be completed at all. The inspection reports received by AOPA have two recurring issues. First, removing the taper pin on aircraft without witness holes can be very difficult. Piper's Service Bulletin No. 1197A dated September 1, 2009 addresses aircraft with taper pins, but does not address the true operational difficulty in removing them. AOPA has received reports of it taking 4 or more hours to remove these pins and also from owners who have had to stop the inspection process for fear of inducing damage to the aircraft.

Second, AOPA has heard from owners of older Piper aircraft that do not use taper pins or have witness holes. Piper's service bulletin does not address these aircraft yet their serial numbers are contained in the proposed AD. Guidance needs to be provided to these aircraft owners and an accurate cost of inspecting and replacing these assemblies needs to be included in the proposed AD.

### **Summary**

AOPA believes that the FAA needs to ensure the proposed AD includes the narrowest number of aircraft and that the cost of compliance is realistically calculated and presented. At a minimum, the FAA needs to adjust the cost of compliance for this proposed AD to include a realistic cost of inspection for these aircraft and examine Piper's assembly practices over time to try to exclude aircraft from a potential AD.

U.S Department of Transportation  
Page 3  
January 5, 2010

If the FAA feels an AD is still warranted, the compliance timeline should be at the next annual. The incredibly low fleet-wide incidences do not justify a more restrictive timetable or flight time compliance interval.

Sincerely,

A handwritten signature in black ink, appearing to read "Leisha Bell", written over a light blue horizontal line.

Leisha Bell  
Director  
Aircraft and Environment