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December 15, 2010

U.S. Department of Transportation
Docket Operations, M-30
Room W12-140
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Docket No. NHTSA-2010-0154 Terrafugia, Inc.; Receipt of Application for Temporary Exemption from Requirements for Tire Selection and Rims for Motor Vehicles FMVSS No. 110, Electronic Stability Control Systems FMVSS No. 126, Glazing Materials FMVSS No. 205, and Occupant Crash Protection FMVSS No. 208

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 400,000 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 in support of Terrafugia's petition for temporary exemption from certain Federal Motor Vehicle Safety Standards (FMVSS) requirements for its Transition® Light Sport Aircraft that has road-going capability.

Terrafugia is petitioning for a temporary exemption from FMVSS No. 110 Tire Selection and Rims for Motor Vehicles, FMVSS No. 126 Electronic Stability Control Systems, FMVSS No. 205 Glazing Materials, and FMVSS No. 208 Occupant Crash Protection. In the petition, Terrafugia explains their reasons for requesting the exemption and their methods for addressing safety concerns.

Terrafugia asserts in the petition that the requested exemptions are in the public interest because the Transition will increase the safety of flight for General Aviation in the United States, contribute to the advancement of technology for light aircraft and light-weight, fuel efficient automobiles, and improve the environment and economy. They also state that one of the most significant causes of GA accidents and fatalities is weather and that a leading cause of weather-related accidents is when pilots flying primarily on visual references (Visual Flight Rules or VFR) find themselves in a situation where those references are compromised (Instrument Meteorological Conditions or IMC), get disoriented, and enter an unrecoverable situation that results in an often fatal accident. The Transition® offers a new alternative to pilots, which allows them to divert to the nearest airport and continue the trip on the ground.

AOPA supports the granting of the Terrafugia's exemption request. VFR-into-IMC accidents accounted for 51.4 percent of the fatal weather related accidents in 2008 as reported by the Air Safety Institute's Nall Report. Over the past ten years (2000 – 2009), 86% of VFR-into-IMC accidents have resulted in fatalities. The *Joseph T. Nall Report* is the AOPA Air Safety Foundation's annual review of general aviation aircraft accidents that occurred during the previous year. The Transition's® ability to land and continue on via roads will give the pilots of these aircraft an attractive option to avoid bad weather while continuing their travels in a safe and efficient manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert E. Hackman", with a long horizontal flourish extending to the right.

Robert E. Hackman
Vice President, Regulatory Affairs
Aircraft Owners and Pilots Association