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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-2011-0562 Airworthiness Directives; Cessna Aircraft Company 310, 320, 340, 401, 402, 411, 414, and 421 Airplanes**

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 has several concerns about the FAA's proposed AD for Cessna 310, 320, 340, 401, 402, 411, 414, and 421 twins. The proposed AD states that "[t]his proposed AD was prompted by an investigation of recent and historical icing-related accidents and incidents for the products listed above." In order to address the issue, the FAA is proposing "to prohibit flight into known icing conditions as well as increase the approach speed in case of an inadvertent encounter with icing."

According to the FAA, "These airplanes' certification basis did not include Amendment 7 of CAR 3 Dated May 15, 1956, which required an applicant to provide to the pilot the types of operations and meteorological conditions (e.g. icing conditions) to which the operation of the airplane is limited by the equipment installed (C AR 3 § 3.772). Therefore, the pilot may not realize that, even with de-ice boots or other similar equipment installed, the airplane is not certificated for flight into known icing conditions." AOPA strongly agrees that the certification status of an aircraft and the limitations placed on that aircraft needs to be made clear to operators. Cessna addressed this issue in the issuance of a mandatory service bulletin in 1997. Service bulletin MEB97-4 was issued to resolve any confusion regarding the icing certification status of these twin-Cessna aircraft.

Since the mandatory service bulletin already addresses this issue, AOPA questions whether or not a real safety concern exists for these airframes in particular and if the proposed two placards would have any effect on safety. The summary of accidents and incidents included in the notice of proposed rulemaking does not break down the numbers which are classified as accidents and which are incidents nor does it include any information as to how the statistics relate to other aircraft types. The summary also doesn't

break down the number of accidents or incidents in aircraft equipped with the no-hazard deice systems or whether or not owners had complied with the service bulletin from 1997. Without real statistical evidence to suggest that these types of aircraft are more susceptible to icing conditions, we question the reasoning behind singling these aircraft out through the issuance of an AD.

Similar accidents have occurred in other aircraft and represent the disconnect that exists between pilot awareness of icing operations and icing certification of a particular aircraft, not an unsafe condition in the aircraft itself. The issue at hand is operational, not an airworthiness issue, and therefore should not be addressed by AD. 14 CFR §39.5 addresses Airworthiness Directives and states:

FAA issues an airworthiness directive addressing a product when we find that:

- (a) An unsafe condition exists in the product; and
- (b) The condition is likely to exist or develop in other products of the same type design

This type of operational issue would be best addressed through an educational campaign. Such a campaign would not only address the issue as it relates to twin Cessna aircraft but for all aircraft.

Another concern is that this proposed AD may have unintended negative consequences including a potential increase in aircraft accidents. A placard that mandates an increase in final approach speed by 15 knots substantially increases landing distance required, increasing the like hood of overrun accidents - simply substituting one danger for another. A hazard created by adding redundant or unnecessary placards to an aircraft is that they would lose some of their effectiveness by sheer overload and that safety-critical placards would get lost on the panel.

AOPA supports educational efforts to improve safety and reduce the number of icing accidents that occur annually. We believe that in the case of aircraft accidents resulting from inadvertent encounters from flight into icing conditions, educational efforts should target all pilots on all aircraft types. There are limits to all aircraft no matter what level of ice protection is installed. No aircraft is designed to allow unlimited flight in icing conditions and any aircraft flying an approach with residual ice will need to make adjustments in the approach configuration and speed. These issues are best addressed through broad educational efforts.

AOPA's Air Safety Institute offers interactive courses on this topic and we would be willing to assist the FAA in the development of other educational initiatives of this type.

Sincerely,



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AOPA  
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