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November 5, 2024

BY ELECTRONIC DOCKET ONLY

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-2024-2143; Project Identifier AD-2024-00008-A; *Airworthiness Directives; Piper Aircraft, Inc. Airplanes*

The Aircraft Owners and Pilots Association (AOPA) is the largest aviation membership association, representing pilots, aircraft owners, and aviation enthusiasts since 1939. AOPA serves its membership through advocacy and promotion of the safety and fun in general aviation flying, and respectfully submits this comment on behalf of its hundreds of thousands of members in response to the above referenced proposed rule.

Introduction

On January 15, 2021, the Federal Aviation Administration (FAA) published AD 2020-26-16, which was prompted by a report of a wing separation caused by fatigue cracking in a visually inaccessible area of the lower main wing spar cap. This AD required calculating the factored service hours for each main wing spar to determine when an inspection is required, inspecting the lower main wing spar bolt holes for cracks, and replacing any cracked main wing spar. The FAA then issued AD-2024-00033-A based on inspection results from the previous airworthiness directive.

AOPA supports the airworthiness directive system to help ensure safety in the national airspace system. AOPA also appreciates and supports the FAA's efforts to provide an effective AD development process and respectfully provides the following comments to help determine the necessity for AD issuance and appropriate scoping if so.

AOPA supports comments provided by Piper Aircraft, Inc. dated October 7, 2024, posted on Docket No. FAA-2024-2142, Project Identifier AD-2024-00008-A due to the similarities.

Piper Aircraft, Inc. provides extensive evidence to justify a thorough FAA review of not only the wide expansion of affected aircraft but also the rescission of the AD based on previous justification used in the rescission decision from the 1989 of a previous AD. Hundreds of other comments raise many concerns with how the FAA is calculating the scope and method of calculation to determine

when and how inspections are to be performed in addition to who would be able to perform the inspection.

Piper's summary of the fleet's inspection finding analysis of aircraft inspection results, demonstrates a low 0.194% rate; less than half of the rate recorded in 1989 when that AD was rescinded. The evidence provided by Piper Aircraft Inc. and other commenters is compelling and warrants the FAA to complete a thorough review of all concerns identified by commenters to ensure this AD is properly scoped and if the evidence warrants, a rescission as was completed in 1989 is completed.

The high-risk identified of damaging bolt attachment holes when performing the inspections must be considered as the remedy should never increase risk of damage. Damage done when performing the inspection called out by the AD could be hidden when reassembled, increasing the risk of failure.

AOPA requests the FAA work transparently with Piper Aircraft, Inc. in resolving the issues and concerns raised in their letter.

Murray Huling
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Aircraft Owners and Pilots Association