

November 14, 2001

Mr. Paul DeVore
Aerospace Engineer
FAA – Wichita ACO
ACE-116W
1801 Airport Rd.
Wichita, KS 67209

Dear Mr. DeVore,

On behalf of more than 375,000 pilots and aircraft owners, the Aircraft Owners and Pilots Association (AOPA) submits the following comments to your Airworthiness Concern Sheet (ACS) dated August 13, 2001. The ACS highlights accidents involving attempted takeoffs in various model Raytheon (Beechcraft) airplanes with flight control gust lock installed.

AOPA agrees that, in this particular situation, the potential for attempted takeoff with flight control gust lock installed warrants some concern. However, as stated in previous comments on this subject, AOPA believes a pilot's failure to remove a flight control gust lock prior to attempting takeoff is an operational issue rather than an airworthiness concern.

In March of 1999 AOPA submitted comments to the FAA on the subject of attempted operations with flight control gust locks installed (ref. AOPA letter to Mr. T. N. Baktha, Wichita ACO, dated March 16, 1999). In those comments AOPA pointed out that there were very few accidents in which a pilot attempted takeoff in a Beech airplane prior to removing the flight control gust lock. Further, AOPA pointed out that in each of those instances, the pilot's conduct of only *one* of many standard pre-flight procedures would have led to the discovery and removal of the flight control gust lock prior to attempted takeoff.

AOPA is aware of the one additional accident (cited in your most recent ACS) involving an attempted takeoff in a Beechcraft airplane prior to removing the flight control gust lock. A review of the NTSB accident report for this incident (NTSB FTW00FA146) reveals that, like in other accidents of this type, the pilot of the accident airplane failed to complete a proper pre-flight inspection, failed to properly use checklists, failed to employ proper taxi techniques, and failed to conduct a complete and thorough engine run-up procedure prior to attempting takeoff.

November 14, 2001
Federal Aviation Administration
Page 2

As in the three other occurrences of this type of accident, proper conduct of any *one* of these several standard pre-flight operational items would have led to the discovery and removal of the flight control gust lock and completely precluded the accident.

Given the similarities between the few instances of accidents of this type, AOPA fails to see how this situation has changed since the submission of our March 1999 comments on this issue. As was the case in the three historical gust lock related accidents, the May 2000 accident cited in the ACS fails to point out any deficiency in the airworthiness of the airplane or its certified equipment. Thus, AOPA maintains that a pilot's failure to remove the flight control gust lock prior to attempting takeoff is an operational issue rather than an airworthiness concern.

AOPA believes this operational concern may be best mitigated through the issuance of a Special Airworthiness Information Bulletin reminding pilots of certain airplanes to remove the flight control gust lock prior to attempting takeoff.

Thank you for your time and consideration in this matter. AOPA stands ready to assist the FAA in developing the best means to mitigate this concern.

Sincerely,

Andrew Werking
Associate Director
Regulatory and Certification Policy

cc: Michael Gallagher – Manager, FAA Small Airplane Directorate
Bill Timberlake – Manager, FAA Small Airplane Directorate Project Support Branch