



August 30, 2013

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-2012-0002: Airworthiness Directives; Continental Motors, Inc. Reciprocating Engines Notice of proposed rulemaking (NPRM)



The cosigners of this letter represent the pilots, aircraft owners, operators, and small businesses impacted by the FAA's proposed Airworthiness Directive (AD) FAA-2012-0002 on certain Airmotive Engineering Corp. replacement cylinder assemblies marketed by Engine Components International Division (ECi). With this letter, we are requesting that the FAA provide to the docket the data and analysis that led to the agency's proposal. We are asking that the agency either withdraw the NPRM until such time as information can be provided to the docket or, that the Agency extend the comment period 120 days from the time additional information is provided.



The FAA estimates that this AD would affect approximately 6,000 aircraft costing operators a combined \$82.6 million. This proposed AD would result in an enormous financial burden for the industry and requires the replacement of many cylinders, in addition to repetitive inspections. The early retirement of cylinders goes well beyond the February 2012 safety recommendation of the National Transportation Safety Board.



According to the notice, this AD was prompted by reports of "multiple cylinder head-to-barrel separations and cracked and leaking aluminum cylinder heads." To date the FAA has provided no supporting or substantial data of any kind to the docket to back its proposed action. Additionally, at this time the docket contains no FAA supplied reports of the referenced "multiple cylinder head-to-barrel separations" or any accident reports or Service Difficulty Reports that the FAA may have used in developing the extensive and significantly burdensome course of action proposed in this notice.

While we share the Agency's concern for the safety of General Aviation, without the Agency providing supporting data used in drafting this proposal, we can neither fully understand nor evaluate the agency's safety concerns. This inhibits the industry's ability to effectively comment on the Agency's safety concerns and provide potential alternatives to the proposed course of action.

We request that the Agency post to the docket, the risk analysis and all supporting data and documentation that lead to the decision to require this level of action.



Specifically, we ask that any information, including the “multiple cylinder head-to-barrel separations and cracked and leaking aluminum cylinder heads,” referenced in the proposal as well as any accident or incident reports and Service Difficulty Reports the agency may have used as a part of its analysis be included. Our request that this data be added to the docket is supported by the Agency’s Airworthiness Directive Manual which states, “the AD docket must contain any documents that support the 14 CFR part 39 action.”

In closing and to summarize, we are requesting that the Agency provide the supporting data and analysis used in developing this proposal and any future proposals. We are also asking that the proposal be immediately withdrawn until such time as this information is made available, or once this data and analysis is supplied, the comments period be extended an additional 120 days, to provide for full review, analysis and formulation of sustentative comments.

Sincerely,



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



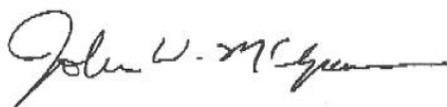
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