



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

September 12, 2005

Mr. Doug Rudolph
Aerospace Engineer
Federal Aviation Administration
Small Airplane Directorate, ACE-112
901 Locust Street, Room 301
Kansas City, MO 64106

RE: Mitsubishi Model MU-2B airplanes ACS

Dear Mr. Rudolph,

The Aircraft Owners and Pilots Association (AOPA), representing over 404,000 members, opposes the Federal Aviation Administration's (FAA) plan to have its Small Airplane Directorate lead a Safety Evaluation Investigation concerning the MU-2B aircraft. We are concerned that the FAA, in light of recent MU-2B accidents and under Congressional pressure, is rushing to fix a problem that has not even been quantified. Further, initial indications are that the recent accidents have nothing to do with the airworthiness of the airplane. While the Directorate has expertise limited to aircraft certification on smaller general aviation aircraft, it is not the appropriate office to conduct a comprehensive review of potential accident causal factors that could be attributed to pilot error or other causes.

For these reasons, AOPA requests that the FAA transfer the leadership of the Safety Evaluation Investigation from the Small Airplane Directorate to either the Office of Accident Investigation or Flight Standards. AOPA also recommends that the FAA commit to meeting with knowledgeable individuals that own, operate, maintain, or provide training in MU-2B airplanes.

AOPA distributed the Airworthiness Concern Sheet (ACS) to appropriate aircraft type clubs for their input. The MU2 Aircraft Owners and Pilots Association (MAOPA) canvassed their members that own and operate MU-2B airplanes. And the input received thus far strongly suggests that MU-2B accidents are largely caused by pilot error and are NOT the result of aircraft deficiencies or shortcomings. In addition to an extensive aircraft certification process, the FAA has thoroughly re-evaluated the MU-2B on at least two separate reviews. In all of these examinations the airplane was determined to be safe and airworthy. This clearly does not indicate an airplane airworthiness issue or concern. For this reason, AOPA believes it would be more appropriate for either the Office of Accident Investigation or Flight Standards to lead the proposed Safety Evaluation Investigation rather than the Small Airplane Directorate. All operational safety and training initiatives, including any comprehensive review of MU-2B flight training and

Mr. Doug Rudolph
Page 2
September 12, 2005

accidents should be conducted under the supervision and direction of the FAA office responsible for these matters.

AOPA realizes the importance of a timely resolution to this concern. To that end, we recommend that the FAA hold a forum within the next month, where FAA officials can meet with representatives from AOPA, MAOPA, and other MU-2B interested parties knowledgeable on MU-2B operations and training to properly identify the true causal factors associated with the recent MU-2B airplane accidents and to explore possible solutions. Participation and input from these parties is essential to the FAA in conducting a proper safety investigation and analysis of the MU-2B airplane. AOPA is offering to host such a meeting at our facilities in Frederick, MD for this purpose.

AOPA's Headquarters facility provides an excellent venue for all interested parties to meet and address the FAA's concerns regarding the MU-2B airplane and ultimately to reduce MU-2B fatal accidents. MAOPA has offered to bring an MU-2B airplane to Frederick for display and orientation rides for those who are not familiar with the airplane or its unique flight and handling characteristics.

Thank you for the opportunity to comment on this ACS and we look forward to working with the FAA on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luis M. Gutierrez', is written over a horizontal line.

Luis M. Gutierrez
Director, Regulatory and Certification Policy

cc: Steven Wallace, Director, FAA Office of Accident Investigation
Jim Ballough, Director, FAA Flight Standards Service