



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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June 7, 2005

Mr. William O'Brien
Federal Aviation Administration
Aircraft Maintenance Division
800 Independence Ave., SW
Washington, DC 20591

RE: Proposed Revision to Advisory Circular 43.13-2A, Acceptable Methods, Techniques, and Practices—Aircraft Alterations

Dear Mr. O'Brien:

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 members submits the following comments to the Federal Aviation Administration's (FAA) Proposed Revision to Advisory Circular (AC) 43.13-2A, Acceptable Methods, Techniques, and Practices—Aircraft Alterations Request for Comments (RFC) published in the Federal Register on June 9, 2004. AOPA believes that the proposed changes are positive, but do not go far enough and offers the following recommendations to make new avionics installations more convenient and affordable for general aviation aircraft owners.

AOPA is a strong proponent and advocate for making new avionics installations in general aviation aircraft easier and more affordable. Advances in aviation technology, primarily in avionics, benefit pilots by providing better situational awareness and ultimately enhancing safety and utility for general aviation. AOPA believes that streamlining the approval process will allow for easier safety enhancing alterations to be made on general aviation aircraft.

The FAA Flight Plan 2005-2009 emphasizes the importance of implementing advanced technologies to reduce general aviation accidents. Each organization within the FAA has the responsibility to support this goal and take whatever steps are necessary to promote equipping of advanced safety enhancing avionics. Therefore, any revision to this AC must eliminate barriers for aircraft alterations by providing mechanics and repair stations with useful data to approve avionics installations that are being done today through field approval.

AOPA supports the use of alteration data as approved data

While AOPA supports the FAA's proposed new policy to allow mechanics and repair stations to use acceptable data as approved data for major alterations to certain non-pressurized piston aircraft, we believe the proposal can go further and offer the following recommendations.

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Expand policy to all non-pressurized piston aircraft weighing less than 12,500 pounds

AOPA recommends that the FAA expand its new policy beyond what is proposed in the RFC to apply to all non-pressurized piston aircraft of 12,500 pounds or less maximum gross weight regardless of the airplane's complexity, seating capacity, engine horsepower, or other characteristic. We believe the FAA can do this without reducing the level of safety.

AOPA conducted an analysis of accidents occurring over the past 10 years that involved fixed-wing aircraft weighing less than 12,500 pounds, where the cause or factor in the accident was attributed to an improper major alteration or modification. Our research failed to show any correlation to an airplane's complexity and found that only 17 or 0.07% of the total accidents for the 10-year period were attributed to improper alterations.

Because of this statistically insignificant number of accidents and the fact that the airplane's complexity is irrelevant, we believe the FAA can safely expand its new policy to all non-pressurized piston aircraft weighing less than 12,500 pounds.

Eliminate requirement for FSDO approval of placards and aircraft flight manual supplements

AOPA recommends that the FAA further reduce the need for field approvals by eliminating requirements for Flight Standards District Office (FSDO) approval of placards and aircraft flight manual supplements (AFMS).

Even with the proposed revisions to this AC, the FAA would still have in place policies that discourage equipage of advanced avionics. For example, installation of Wide Area Augmentation System (WAAS) avionics would still require installers to seek FSDO approval of placards and AFMS. These additional burdens on the installer and aircraft owner discourage the very equipage called for in the FAA Flight Plan.

To meet the FAA's intent to reduce the need for field approvals as stated in the RFC, we strongly urge the FAA to develop a strategy, which results in the seamless installation of certified avionics without further coordination from the FSDOs.

Allow IAs with appropriate training to approve major alterations on behalf of the FAA

Many field approvals on general aviation aircraft are not complex and could be approved by the holder of an inspection authorization (IA) instead of the FAA. On vintage aircraft (those over 40 years old), the experience and knowledge base of the industry resides within the type clubs and with IAs that maintain and inspect the aircraft daily. In many instances, the type clubs or IAs instruct the FAA personnel on the alterations, processes, etc. prior to the FAA personnel approving the alteration. Having the IA sign off the alteration would streamline the process while maintaining the appropriate level of safety.

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Define new policy in FAA Order 8300.10

Before the FAA releases the revised AC 43.13-2A, Order 8300.10 Chapter 1 should be amended to reflect the change in policy that would allow mechanics and repair stations to use acceptable data as approved data for major alterations, as well as the other recommendations mentioned above. FAA Orders are used to instruct and direct FAA personnel on how to accomplish their responsibilities. Modifying the Order will ensure that implementation of the recommendations is accomplished.

AOPA believes that adopting these recommendations will result in a more efficient and expedient process for aircraft alterations, and more importantly, will contribute to the FAA successfully attaining its safety and technology goals as outlined in the FAA Flight Plan while significantly reducing the agency's workload.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Luis M. Gutierrez", with a long, sweeping flourish extending to the right.

Luis M. Gutierrez
Director, Regulatory and Certification Policy
Aircraft Owners and Pilots Association