



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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April 20, 2006

Mr. Nicholas A. Sabatini
Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

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Dear Mr. Sabatini:

Representatives from the Aircraft Owners and Pilots Association (AOPA) had the opportunity to participate in the recent Federal Aviation Administration (FAA) Aging Aircraft Public Meeting in Kansas City. We appreciated the FAA holding the meeting and want to work with the Agency on issues affecting aviation safety.

One troubling theory expressed at the meeting is the notion that the aging general aviation fleet poses an increasing threat to aviation safety. This is simply not true.

The accident statistics do not support the concern that aging general aviation aircraft pose an increasing threat to aviation safety. A review by the AOPA Air Safety Foundation (ASF) of accident records from 1983 to 2004 shows that for general aviation aircraft weighing 12,500 pounds or less, the problem of mechanical or maintenance failure due to age is actually declining. And accidents caused by structural failure account for less than one-third of one percent (0.3 %) of all general aviation accidents.

AOPA believes that the continued safety of the aging general aviation fleet can be better assured by promoting safety through education rather than regulation, and by facilitating the maintenance, repair, and alteration of older airplanes through progressive FAA maintenance policies.

AOPA, the FAA, and other organizations have already done much in the way of providing guidance and education to pilots and owners on the effects of age on airplane airworthiness. The FAA's own Best Practices Guide for Maintaining Aging General Aviation Airplanes, developed in coordination with AOPA and others, provides useful guidance and tips for owners to assess the effects of aging on their airplanes. We believe this goes a long way to address the FAA's concern over the safety of the fleet. AOPA also publishes monthly magazine articles related to issues affecting airframe and powerplant, and ASF offers an extensive arsenal of educational materials online that are targeted at keeping aircraft safe, like the highly successful "Engine and Propeller" course. AOPA believes that these on-going efforts to educate pilot and owners are largely responsible for the 39 percent reduction in the number of mechanically related accidents over the past 20 years, despite an increase in the average age of the general aviation fleet.

Mr. Nicholas A. Sabatini

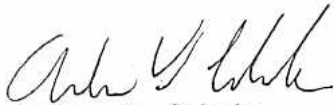
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An important action needed is for the FAA to continue adopting maintenance-friendly policies, particularly with respect to data availability. Doing so is essential to the continued airworthiness of older airplanes. The FAA has already done this to a limited extent by allowing the use of “acceptable” data as “approved” data for certain maintenance and major repair functions (FAA Notice 8300.119 and AC 43.13-1B). AOPA asks that the FAA continue to encourage and adopt similar policies to allow the use of “acceptable” data as “approved” data for airplane major alterations and for vintage airplane material and part substitutions (proposed revision to AC 43.13-2A and draft AC 23-XX – AOPA submitted comments to both).

AOPA is committed to safety. That is why we ask that the FAA continue to pursue a non-regulatory approach to ensuring the continued airworthiness of the aging general aviation fleet that is data driven and based on sound risk management practices that will yield affordable solutions.

Sincerely,



Andrew V. Cebula
Executive Vice President
Government Affairs