



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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September 8, 2006

BY ELECTRONIC MAIL

Ms. Mary Ellen Anderson
Federal Aviation Administration
Delegation & Airworthiness Programs Branch
MMAC, AIR-140
Oklahoma City, OK 73125
Electronic Address: mary.ellen.anderson@faa.gov

RE: Notice of Policy Change; Printing and Distribution Changes for Airworthiness Directives and Special Airworthiness Information Bulletins

Dear Ms. Anderson:

The Aircraft Owners and Pilots Association (AOPA) representing over 408,000 members requests that the Federal Aviation Administration (FAA) continue to mail printed versions of engine Airworthiness Directives (ADs) and Special Airworthiness Information Bulletins (SAIBs) to all affected owners and operators until the FAA makes enhancements to its e-mail subscription service that would ensure the continued availability and dissemination of relevant safety information. While AOPA generally supports the electronic distribution of ADs and SAIBs, we do not believe the FAA has an adequate capability in place to ensure that all ADs and SAIBs reach the affected individuals.

Proposal to Limit Printed Engine ADs Could Adversely Affect Safety

The FAA's proposal to only mail ADs applicable to a certain engine model to the owners and operators who have registered their engine and not to the registered aircraft owners and operators referenced in the AD could adversely affect safety because some owners may not receive notification of an AD that is applicable to their engine. AOPA requests that the FAA continue to mail engine ADs to the owners of aircraft that the engine is applicable to and identified in the engine Type Certificate Data Sheet (TCDS) until the FAA has in place an AD e-mail subscription service and has allowed a reasonable time for owners and operators to learn about and subscribe to the service. AOPA also recommends that the FAA educate owners and operators on the importance of having accurate engine information on file with the FAA and in the procedures to update inaccurate records. AOPA can help the FAA with this educational outreach.

Updated Emergency ADs Should Continue to be Mailed

The FAA proposes to continue mailing or faxing Emergency ADs (EADs) to affected owners and operators, but the agency says that the final rule version of an EAD will no

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longer be mailed because this is a duplicate mailing. AOPA agrees with this change to the extent that the AD has not changed between the EAD and the final AD published in the Federal Register. If the final AD has changed (and some do), then we believe an updated AD should continue to be mailed to affected owners and operators.

Improve e-Mail Subscription Service for SAIBs

The FAA proposes to no longer mail SAIBs to individual owners, operators, or repair stations because SAIBs are now available through a free e-mail subscription service. AOPA however believes that the FAA's current subscription service is inadequate because a subscriber cannot select which SAIBs to receive. The FAA's current SAIB subscription service requires subscribers to accept an e-mail notification any time a new SAIB is issued regardless of the aircraft or engine make and model. This limitation may deter some individuals from subscribing to the FAA's e-mail service. AOPA recommends that the FAA modify its SAIB subscription service to include user-defined fields that would allow an owner or operator to select SAIBs based on aircraft or engine make and model.

Create an e-Mail Subscription Service for ADs

AOPA further recommends that the FAA develop a similar e-mail subscription service for ADs. In the interest of safety it is imperative that the agency continue to mail engine ADs to all owners of aircraft where the engine is identified in the TCDS until the FAA has implemented an AD e-mail subscription service and has widely publicized its availability.

AOPA appreciates the opportunity to comment and we look forward to working with the FAA on educating pilots and aircraft owners about this change.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luis M. Gutierrez', with a stylized flourish at the end.

Luis M. Gutierrez

Director

Regulatory and Certification Policy