



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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BY ELECTRONIC MAIL

Kevin L. Brane
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RE: Airworthiness Concern Sheet; New Piper Service Bulletin 1164 - Piper PA-28R-200 RPM Limitation and Tachometer Re-Marking

Dear Mr. Brane:

The Aircraft Owners and Pilots Association (AOPA) representing over 408,000 members requests that the Federal Aviation Administration (FAA) work with The New Piper Aircraft company and Hartzell to change the propeller RPM limitations in both the airplane and propeller Type Certificate Data Sheets (TCDS), or issue a Special Airworthiness Information Bulletin (SAIB) to alert owners of the discrepancy. Owners of affected PA-28R-200 models should not have to pay for the FAA's and Piper's oversight while the airplane was undergoing certification over 35 years ago.

Pilots have flown the Piper PA-28R-200 airplane safely for over 35 years while operating within the existing tachometer limitations and current AFM guidance. AOPA believes that based on this safe operational service history, TCDS No. 2A13 (page 15) and TCDS No. P-920 (page 8) should be revised to read, "Avoid continuous operation between 2100 - 2350 r.p.m." rather than unnecessarily forcing owners to pay for a "fix" to a problem that does not exist. As the FAA notes in the ACS, there have not been any field service difficulties identified with the vibration interaction between the Lycoming IO-360-C1C engine and the Hartzell Model HC-C2YK propeller.

Another option would be for the FAA to issue an SAIB in lieu of an airworthiness directive given that there is no unsafe condition because of the incorrect markings.

Thank you for the opportunity to comment. We look forward to working with you on this and future airworthiness concerns.

Sincerely,

Luis M. Gutierrez
Director
Regulatory and Certification Policy