

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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January 8, 2001

Federal Aviation Administration Central Region – Office of the Regional Counsel ATTN: Rules Docket No. 2000-CE-26-AD 901 Locust, Room 506 Kansas City, Missouri 64106

Gentlemen,

The Aircraft Owners and Pilots Association (AOPA), representing the aviation interests of more than 365,000 pilots and aircraft owners, submits the following request for extension of the comment period of proposed airworthiness directive NPRM 2000-CE-26-AD. The AD proposes to supercede AD 80-04-08 by requiring inspections for chafing between map light switches and fuel lines and requiring the repetitive inspection and installation of map light switch covers on various model Cessna 172s.

AOPA recognizes that, in this particular situation, the potential for chafing between the map light switch and the fuel line, subsequent fuel leakage and/or electrical arching and possible in-flight fire warrant airworthiness concern. Given the relative lack of service information available in the FAA's Service Difficulty Report database and the ambiguity of pertinent parts of NTSB accident reports, AOPA feels it is necessary to coordinate an information gathering effort with appropriate aircraft type-clubs and owners/operators of affected airplanes.

As many aircraft type-clubs and aircraft owners/operators still rely very heavily upon printed communications media, a 30-day comment period does not provide adequate time to request and receive pertinent service information from owners and operators of affected airplanes. AOPA, therefore, respectfully requests an extension of at least 120 days to the comment period of NPRM 2000-CE-26-AD so that we may contact appropriate aircraft type-clubs/owners/operators and provide objective and specific comments to the AD proposal.

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Thank you for your time and consideration in this matter. AOPA stands ready to assist the FAA in reconsidering the length of comment period and the extent of the actions required by this airworthiness action.

Respectfully,

Andrew Werking

Government Specialist - Regulatory and Certification Policy

cc: Michael Gallagher – Manager, FAA Small Airplane Directorate
David R. Showers – Acting Manager, FAA Small Airplane Directorate