



**AIRCRAFT OWNERS AND PILOTS ASSOCIATION**

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December 31, 2003

Mr. Paul Nguyen  
Engineer-Airframe  
FAA – Wichita ACO  
1801 Airport Rd.  
Wichita, KS 67209

Re: Airworthiness Concern Sheet – Beech Models 45 (YT-34), A45 (T-34A, B-45), and D45 (T-34B) airplanes

Dear Mr. Nguyen,

On behalf of more than 400,000 pilots and aircraft owners, the Aircraft Owners and Pilots Association (AOPA) submits the following comments to your Airworthiness Concern Sheet (ACS) on certain Beech aircraft wing spars dated December 22, 2003.

The ACS highlights issues surrounding the recent crash of N44KK, a T-34A operated by Texas Air Aces. The ACS specifically addresses evidence of fatigue cracking in the area of 2 fasteners at W.S. 66 rear spar. The ACS goes on to further state that the FAA is considering rescinding all four existing AMOCs (alternate means of compliance) to AD 2001-13-18 and the 200-hour extension that was referenced in SAIB CE-02-38R2.

According to the ACS, the FAA is considering re-approving all four AMOCs when they have been revised to include corrective actions for additional wing spar locations. Additionally, the FAA is considering requiring an eddy current inspection in accordance with RAC Service Bulletin SB 57-3329 within 20 hours or 30 days and repeated every 80 hours.

The ACS appears to provide no provision for those aircraft whom have not yet complied with AD 2001-13-18 or have not complied with any of the AMOCs. Currently, these aircraft are still able to fly via the 200-hour extension granted by the FAA. Many of these aircraft are scheduled to receive one of the AMOCs in the near future. The rescinding of the 200-hour extension would serve to ground these aircraft until such time as they comply. We would ask that a provision allowing these aircraft to continue flying be considered in any action taken by the FAA.

AOPA is also concerned that the timeframe provided of 20 hours or 30 days will have a significant negative impact on owners. The resulting demand on the limited number of providers capable of performing the preparation and eddy current inspections could lead to a considerable number of aircraft unable to comply in this narrow timeframe. We are also concerned that the 80 hours between inspections will negatively impact the ability of ongoing compliance by causing significant delays. These delays in turn, will place a

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heavy burden on operators in loss of flight time and utilization of aircraft as they continue to perform the required inspections.

We would ask the FAA to continue to work with industry to establish a more reasonable timeframe for the initial inspection beyond the 20 hours or 30 days proposed in the ACS. A longer timeframe would allow for the continued flight of impacted aircraft. AOPA would also ask that the FAA continue to work closely with the holders of existing AMOCs as they develop methods of compliance to address these new concerns. An extension of the 80 hours or elimination of the recurrent inspections altogether through an AMOC would be of tremendous benefit in cost savings to this community.

AOPA appreciates the efforts of the FAA to solicit input from industry before proceeding with airworthiness actions.

Sincerely,

A handwritten signature in black ink, appearing to read 'RHackman', with a horizontal line extending to the right.

Robert E. Hackman  
Manager, Regulatory and Certification Policy  
Aircraft Owners and Pilots Association