

February 16, 2001

**TRANSMITTED VIA
FACSIMILE AND ELECTRONICALLY**

Mr. Bill Marshall
Federal Aviation Administration
Small Airplane Directorate
Regulations and Policy Branch ACE-111
901 Locust St Room 301
Kansas City, MO 64106

RE: **Proposed Issuance of Policy Memorandum, Automatic Pilot (Control Wheel Steering)
Applications for Part 23/CAR 3 Airplanes [Policy Statement Number ACE-00-23.777-01]**

Dear Mr. Marshall:

The Aircraft Owners and Pilots Association (AOPA), representing the aviation interests of more than 360,000 pilots and aircraft owners, respectfully submits the following comments to the Federal Aviation Administration for consideration:

AOPA requests that the Federal Aviation Administration (FAA) provide more specific information regarding the recent developments that led to this proposed policy and, therefore, also requests an extension of the comment period to May 21, 2001.

Based on our discussions with other industry representatives and FAA staff, it appears that this proposed policy memorandum is substantially different than the FAA's existing certification practice concerning Automatic Pilot Control Wheel Steering Applications for Part 23/CAR 3 airplanes. In light of that observation, AOPA believes that the background information provided in the Federal Register notice (Vol. 66, No. 11 Pg 4056) does not supply enough information to allow the public to provide adequate and appropriate comments. AOPA also believes that it is in the best interests of the entire aviation community to have available for review the *specific documented events and research* that led to this proposed policy memorandum. Extending the comment period to May 21, 2001 should provide sufficient time for the FAA to publish an extension notice in the Federal Register to include the information we are requesting provided such notice is given in a timely manner.

Should the FAA decide to deny AOPA's request to extend the comment period as well as our request for more specific documented events and research leading up to this proposed policy memorandum, AOPA then wishes to be on the record as opposing to the adoption of this policy as proposed.

AOPA does not see any need or justification for the FAA to adopt this proposed policy since there are no supporting human factors research data or accident/incident reports found in the *Background* section of this Policy Statement Notice

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AOPA thanks the FAA for allowing us the opportunity to provide our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Lance Nuckolls". The signature is fluid and cursive, with a long horizontal stroke at the end.

R. Lance Nuckolls
Director – Regulatory and Certification Policy
Aircraft Owners and Pilots Association
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