

December 5, 2000

Federal Aviation Administration (FAA)
Central Region
Office of the Regional Counsel
Attention: Rules Docket No. 2000-CE-24-AD
901 Locust Room 506
Kansas City, MO 64106

To Whom It Concerns:

The Aircraft Owners and Pilots Association (AOPA), representing more than 365,000 pilots and aircraft operators, submits the following comments to the FAA Notice of Proposed Rulemaking (NPRM) Docket No. 2000-CE-24-AD:

AOPA opposes the Airworthiness Directive (AD) action proposed under this NPRM. AOPA strongly believes that the issuance of a Special Airworthiness Information Bulletin (SAIB) or General Aviation Alert (GAA) is the most appropriate course of mitigating action. Our reasoning is as follows:

The proposed AD action is unwarranted using the Initial Risk Assessment Evaluation found in Appendix VI of the FAA Small Airplane Directorate Airworthiness Directives Manual Supplement and conservative assumptions. Our conservative Risk Assessment Evaluation is as follows:

- ◆ (a) Using an unlikely “worst case” scenario, significant aircraft damage and possible injury or death, this particular airworthiness concern would be categorized as “MAJOR” or a Safety Effect number of 2
- ◆ (b) Assuming a very unlikely situation that all Cessna 172RGs are used under 14 CFR 91 For Hire, the Operation Use number would be 2.
- ◆ (c) Using a reasonable assumption that < 25% of all Cessna 172RGs are used in a 14 CFR 135/121, the Percent Use by Population number is 1.
- ◆ (d) Assuming that all 21 SDRs resulted from actual incidents/accidents, 21 “events” over a 5-year period results in a Number of Occurrences of 3. (According to the Cessna Pilots Association, the actual SDR number may be less since there may be multiple SDRs for the same registered airplane).
- ◆ (e) Dividing 766 Cessna 172RGs found on the Federal Registry by 21 “events” results in an Event Versus Population number of -1.
- ◆ (f) Dividing 21 by 5 (number of SDR “events” / number of reporting years, 1995-2000) produces a Time Between Events number of 2.

- ◆ (g) The Cessna 172RG is a Single Engine Reciprocating airplane making the Aircraft Type number 0.

Safety Effect (2) x Operational Use (2) x Percentage Use By Population (1) + Number of Occurrences (3) + Event Vs. Population (-1) + Time Between Events (2) + Aircraft Type (0) = **MAJOR Safety Risk Factor** of **8**. This is within the FAA SAIB/GAA action envelope.

AOPA also believes that the failure of the main landing gear pivot will not result in injury or death since no occurrences of injury/death have resulted from such failure and considering the fact that the landing speed is considerably less than the average complex airplane. Therefore, the "Safety Effect" could be categorized as "MINOR" (1) thus lessening the results to a **MINOR Safety Risk Factor** of **6**. If the "Operation Use" assumption is also changed to a more likely representation of ½ 14 CFR 91 Personal Use and ½ 14 CFR 91 For Hire (such as flight training), a **MINOR Safety Risk Factor** of **5.5** will result.

AOPA concurs with the expert comments to this docket submitted by Cessna Pilots Association that a cracked main landing gear pivot will be manifested in some outward sign such as a "spongy" brake indication or loss of brake fluid thus further eliminating the need for this proposed AD action.

AOPA requests that the FAA replace the proposed AD action with more appropriate SAIB or GAA mitigating action. The FAA's own handbook guidance dictates that the issuance of a SAIB or GAA should be the appropriate mitigating action instead of the promulgation of regulatory action. AOPA strongly believes that desired purpose of effectively addressing this airworthiness concern can be met without the undue burden of an AD.

Respectfully submitted,

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