

May 25, 2001

Federal Aviation Administration  
Central Region – Office of the Regional Counsel  
ATTN: Rules Docket No. 2000-CE-44-AD  
901 Locust, Room 506  
Kansas City, MO 64106

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing the interest of over 370,000 aircraft owners and pilots, submits the following comments to Notice of Proposed Rulemaking (NPRM) Docket No. 2000-CE-44-AD applying to Raytheon Aircraft Company's Beech 35, 35R, A35, and B35 model airplanes:

AOPA supports the intention of this proposed Airworthiness Directive (AD) of placing Beech Models 35, 35R, A35, and B35 airplanes in a separate AD from other affected Beech 35 series airplanes.

However, AOPA is concerned over certain aspects of NPRM 2000-CE-44-AD and echoes the concerns of the American Bonanza Society (ABS), universally recognized as the leading technical experts for Beech Bonanza series airplane. AOPA's specific remarks and concerns are as follows –

- In Service Bulletin (SB) 27-3358, Raytheon is specifying certain test equipment that does not currently exist at Raytheon's own service centers.
- Skin thickness determination by sonic testing (ultrasound) is not necessary. Direct measurements taken at a lap joint or similar area using a micrometer or similar tool should be more than sufficient to determine the overall thickness of the skin.
- The skin thickness specifications should directly reflect the actual production specifications for each model affected.
- Skin thickness measurements should only be taken one time. Repetitive measurements are unwarranted since it is a virtual impossibility to surface clean the skin below acceptable production tolerances. A one-time inspection will catch any replacement skins that are below tolerance.
- Propeller balancing should be done with any equipment that meets or exceeds the specifications.
- The requirement for propeller balancing should be based on a Time-In-Service since the last overhaul thereby not placing an additional burden on operators who have recently overhauled their propeller.

- A Designated Engineering Representative (DER) should not be required to review the airplane logbooks and documents of prior major modifications. Maintenance personnel holding an FAA Inspection Authorization (IA) certificate can sufficiently conduct this required review. If needed, the IA mechanic could request a DER review of any modification deemed questionable by the IA. AOPA is also concerned that many of these older modifications may not have data that is suitable by newer FAA standards and that a DER review of older modification data may result in declaring the airplane not airworthy. Again, AOPA believes that if an IA mechanic has serious concerns or questions regarding a modification, a DER may be used for further review.

AOPA requests that the FAA make revisions to NPRM 2000-CE-44-AD that reflect our aforementioned concerns and subsequently publish it as a revised NPRM for public comment.

AOPA appreciates the opportunity to provide the FAA with our insight on this important airworthiness concern.

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

Cc: Bill Timberlake  
Manager – Project Support Branch  
FAA Small Airplane Directorate