



Kim Smith
Director, FAA Small Airplane Directorate
Federal Aviation Administration
901 Locust St., Room 301
Kansas City, MO 64106

September 30, 2008

RE: FAA Airworthiness Directive 2008-13-17

Dear Ms. Smith:

The American Bonanza Society (ABS) respectfully requests your office review the process that was used to dismiss all comments to the NPRM for AD 2008-13-17, addressing circuit breaker-type switch replacement in numerous models of Beech piston aircraft. Specifically we ask FAA to:

- Re-review the comments filed by ABS, AOPA and others during the NPRM comment period.
- Report to ABS the specific data and investigative processes used by the Wichita ACO to confirm or refute the viability of each comment filed.
- Reconsider whether this costly and intrusive replacement requirement is necessary in light of actual data on the number and scope of incidents associated with circuit breaker overheats.

ABS has polled our membership asking for reports of in-flight overheats or failures of these switches. The result is fewer than 20 events, including the five cited as justification for the Airworthiness Directive. None of these events resulted in a reportable mishap, and in all cases the failed breaker was detected, dealt with in flight, and immediately replaced using existing operations and maintenance procedures. In no case was safety of flight affected. As we commented to the NPRM, there is no data-demonstrated threat of electrical fire in affected airplanes; in the rare event of an in-flight switch failure the condition has been noted, the system shut down in flight, and the switch replaced using existing standards of pilot operation and maintenance.

Even Hawker Beechcraft agrees there is no need for an AD. Hawker Beechcraft's director of propeller airplane support David Rowl noted at the 2008 ABS Convention that the service instruction referenced in the AD is not even considered a "mandatory" Service Bulletin specifically because, in his words, "there is no safety of flight issue." Beech's technical staff does agree with ABS, however, that re-wiring electrical systems with wholesale switch replacement itself presents a far greater chance of in-flight failure than does the very small incidence of completely manageable switch overheats in service.

With no clear pattern of failure, no data suggesting an in-flight hazard as a result of rare switch overheats, and the manufacturer's determination that circuit breaker-type switch overheats do not present a safety-of-flight hazard, ABS respectfully requests FAA reconsider the need for this costly and potentially hazardous Airworthiness Directive.

We look forward to hearing from you. Thank you very much.

Sincerely

Thomas P. Turner
Manager of Technical Services