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Author: PHILBOB3@aol.com at Internet  
Date: 9/2/97 1:51 PM  
Priority: Normal  
TO: 9-NPRM-CMTS at ARM  
CC: warren.morningstar@aopa.org at Internet, PHILBOB3@aol.com at Internet  
Subject: DOCKET #28903

I am opposed to your proposed changes to the existing STC procedures as they would, for all practical purposes, eliminate further improvements to existing aircraft which were type certificated under older rules. The company I work for, Cub Crafters, Inc., is in the business of improving the safety, performance and useability of the Piper PA18 Super Cub. I have personally designed and obtained approval on an STC (#SA92NW, with PMA) for the Super Cub which (1) improves performance (180 HP), (2) improves the landing characteristics (by moving the C.G. rearward a touch, allowing greater braking force without nose-over), (3) reduces cylinder head and oil temperature by a considerable margin, (4) improves the take-off performance (increase in angle of attack with LDG still on runway), and (5) does not increase the empty weight of the aircraft. I have also designed an improved fuel system (STC #SA00415SE, with PMA) which eliminates the header tanks (they burst and dump gasoline on the pilot and passenger in a crash, sometimes in a hard landing) and allows both tanks to be selected at once. I have also designed an improved exhaust system (STC #SA00414SE with PMA) which eliminates the cracking problem due to thermal expansion. Our company holds a large number of STCs, all of which improve safety, performance, useability of the Piper PA18 aircraft. I have about 15 other STC projects in various stages of design, some already submitted to the FAA, some almost ready, and others partially complete. All are aimed at improving safety, performance and useability of the PA18 Super Cub.

Cub Crafters, Inc. is in the business of improving the safety, performance, and useability of the Super Cub. We have a proven track record of excellent modifications. We employ about 15 people, and are just embarking on a large expansion project (new larger production facilities). If this NPRM goes into effect for general aviation aircraft, we will go out of business, and the safety level of the Super Cub will be frozen at it's present level. We have many more improvements to offer, which are not yet approved. Many are in the preliminary design stage. Some are partially complete. Do you really want to deny the aviation community the improvements that Cub Crafters, Inc., and other small companies like us, now offer? Do you want to put more aviation professionals on the unemployment line?

Please delete this ridiculous NPRM.

If you would like to view our facilities, and meet the people we employ face-to-face, please contact me, or Jim Richmond (owner of Cub Crafters, Inc.) at 509-248-9491. We would be delighted to have you to explain to our employees (face-to-face) why you are eliminating their jobs. Perhaps you would like to meet their wives and children too!

Sincerely,

Phil Wells  
PMA/STC Administrator and R&D Engineer  
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