



WHS 02-09

***General Aviation
Manufacturers Association***

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May 10, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

**Subject: Docket Number FAA-2002-11272; GAMA's Comments on NPRM 02-02,
Revisions to Various Powerplant Installation Requirements**

The General Aviation Manufacturers Association (GAMA) is a national trade association representing over 50 American manufacturers of fixed-wing aircraft, engines, avionics, and components. In addition, GAMA member companies also operate aircraft fleets, airport fixed-based operations, pilot and maintenance technician training facilities across the nation. GAMA submits the following comments in response to FAA's Notice of Proposed Rulemaking - *NPRM 02-02, Revisions to Various Powerplant Installation Requirements for Transport Category Airplanes*, published in the Federal Register (67FR4855) on January 31, 2002.

Change 1: § 25.945, Thrust or Power Augmentation System

GAMA has no comments or objections to the proposed change requiring expansion space for thrust or power augmentation system fluid tanks.

Change 2: § 25.973, Fuel Tank Filler Connection

GAMA has no objections to the proposed change requiring pressure-refueling points to have provisions for electrically bonding the airplane to the ground fueling equipment. We do note that the discussion states that this requirement can be met if the refueling receptacle is bonded to the airplane, with the refueling hose providing bonding to the refueling equipment. GAMA recommends that this acceptable Means of Compliance be verified with JAA to insure that the requirement is truly harmonized.

Change 3: § 25.1181, Designated Fire Zones

GAMA has no comments or objections to the proposed change providing a cross-reference in §25.1181(b) to §25.863, 25.865 and 25.869.



Change 4: § 25.1305, Powerplant Instruments

GAMA has no comments or objections to the proposed change to §25.1305(a)(7) requiring fire warning devices to include an audible warning.

GAMA is concerned with the proposed change to §25.1305(d)(2) requiring a means to indicate to the flight crew when the thrust reversing device is not in the selected position, in addition to the current requirement to indicate when the device is in the reverse thrust position. We do not object to the aspect of the proposed change requiring an indication when the stowed position is selected and the device is not stowed. This accounts for the situation where the device is not completely in the forward thrust position, but has not reached the reverse thrust position either.

GAMA does not believe that the aspect of the proposed change requiring an indication when the deployed position is selected and the device is not deployed (enhancing crew awareness) will result in the anticipated safety improvement. In fact, it may even result in a safety reduction because flight crews are already familiar with existing means that are used to notify the flight crew of the condition of the thrust reversing device.

Many current aircraft include AFM and training procedures specifying that the crew check the reverse thrust position indication to verify reverser deployment. This procedure is also backed-up with a mechanical means which prevents application of reverse thrust above idle until the reverser is deployed. By specifying the need for an additional requirement, the proposed rule change would not allow the use of this method which is currently used in many airplanes and familiar to flight crews. GAMA believes there are some safety concerns related to the human factors interaction between the flight crew and the provision for two different thrust reverser indications. A cockpit indication that the reverser has deployed when commanded and another that it has not deployed as commanded may lead to flight crew confusion and potential for inappropriate crew action/response. This is particularly the case when considering previous crew experience and training on similar aircraft which do not incorporate the new indication.

Accordingly, GAMA recommends one of the following actions:

- Conduct human factors studies to evaluate the actual safety benefits of the proposed change
- Revise the proposed change to require an indication only when the forward thrust position is selected and device is not in the appropriate position

GAMA appreciates the opportunity to comment on proposed rulemaking. Please feel free to contact me at wdesrosier@generalaviation.org or (202) 393-1500 or if there are any questions or comments.

Sincerely,



Walter Desrosier
Director, Maintenance & Engineering