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Docket Management System  
U.S. Department of Transportation  
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Washington, DC 20590-0001

FAA-03-15279-5

Subject: Harmonization of Noise Certification Standards for Propeller-Driven Small Airplanes.

As students, having aviation related majors most of whom which are pilots, we here at Central Missouri State University's Aviation Law class would like to submit a few comments in reference to the Notice of Proposed Rule Making that regards Harmonization of Noise Certification Standards for Propeller-Driven Small Airplanes. Some of us feel that harmonizing the noise certification standards for propeller driven aircraft will decrease the potential performance of the aircraft by not making it economical for our aging airplanes to receive beneficial upgrades with a newer engine or propeller package that would meet these noise certifications. Also, the cost of such an upgrade would only add to the high and increasing cost of general aviation, and thus our aviation training. Furthermore, and not with disregard to industry exports, propeller driven airplanes manufactured and sold in the United States that meet our current criteria

for noise certification have a very slim chance of ever flying over Europe and therefore need not comply, or “harmonize” with there noise certifications.

According to GAMA, General Aviation Manufacturers Association, U.S. manufacturers seeking certification or validation of their product in Europe must meet the approval of the European Joint Aviation Authority, or EASA. Harmonizing the United States noise certification standard of testing propeller driven aircraft at maximum sustained R.P.M's with the European standard of testing at the obviously louder maximum R.P.M's, will only succeed in degrading the performance of the aircraft to comply with the quieter standard by running it at lower R.P.M.'s. Brian Meyer of the Hartzell Propeller Inc. agrees in his replied response to your posted NPRM. When you trade off performance for noise constraint, you essentially trade off safety. We do not feel that safety, is a good trade for compliance to a non-applicable European certification in the planes that we fly here in the United States. Is it more important for a young student pilot in the United States who will need all the takeoff and climb performance he can receive in his utility aircraft, that he is using to harness his flight skills to be quieter and comply with the European noise certification standard? We feel that the public that pushes for these lower noise standards would rather have the young pilots have access to, if modified, the enhanced climbing capabilities to keep them safe from crashing rather than keeping them quiet. We are not saying that as a young pilot one needs to be flying high performance airplanes. We are saying however, that with the limited capabilities of the general aviation utility airplanes that most young pilots fly, such as Cessna 150's, 152's and 172's. The FAA considers these planes as having “old technology” engines. Why limit the capabilities any further by having them comply to noise standards at a

higher R.P.M. if we wish to have them upgraded? If a pilot in a plane lacking the performance it could have has to climb to avoid clouds or icing, execute a short field takeoff, or perform any kind of maximum performance climb, is involved in an incident or accident, will it be worth the price of noise reduction?

All of us would agree that the overall cost of maintenance to aircraft is expensive. These maintenance expenses add to the overall expense in the operation of the airplane. Those expenses are passed down to the consumer. In the case of general aviation consisting largely of propeller driven airplanes a lot of times the consumer is the pilot, or an owner renting out the plane to a pilot. By making engine and propeller upgrades for the airplane conform or "harmonize" to European standards, that pilot or owner is being forced to pay more if he or she desires those upgrades in airplane that is already expensive enough. To make it worse, those engine or propeller upgrades won't even be to its fullest performance capabilities if they are forced to comply with Europe's certification standard of testing at maximum engine R.P.M.'s instead of the current United States standard of maximum sustained R.P.M.'s. Like most businesses, one who owns an aircraft and rents it usually does so to earn an income. To maximize ones income logically expenses are cut. Engine and or propeller modifications can be expensive. To make the upgrades comply with more difficult noise certifications will only increase these expenses. If these certified modifications to the "old technology" engines enhance the planes takeoff and climb performance, then making these modifications more expensive and less effective only makes making the plane a safer vehicle more expensive and less effective. As a vehicle of learning, which a lot of general aviation propelled aircraft are, a more expensive airplane only lessens the amount of

training a pilot enhancing his skills can train. That lack of training for the buck once again makes the skies less safe. As a pilot and sole owner of an airplane, the burden of maintenance alone can also be overwhelming. Making it more expensive and less effective for that pilot to enhance the capabilities of his propeller driven airplane will only discourage that pilot to do so. Those performance enhancements could very well be the determining factor in an incident or accident involving his life and the lives of others as well as property damage, thus compromising overall safety.

In the summary of the notice of proposed rule making, it states that “The FAA proposes to amend two technical items to harmonize them with international standards and provide uniform noise certification standards for airplanes certificated in the United States and Joint Aviation Authorities (JAA) countries. This will help to simplify airworthiness approvals for import and export purposes.” For the United States manufacturing aircraft that solely import to other JAA countries and then importing similar planes to the United States that regulation is understandable. The economic relationships with these countries such as these imports and exports are very important and needed. However, for propeller-driven aircraft that are staying in the United States, being manufactured in the United States or be imported to the United States there is no reason why these aircraft should have to comply with European noise Certification standards. It is not very likely that any of these airplanes will fly over to Europe and therefore need no comply with their standards.

In conclusion, a few of us here at Central Missouri State University’s Aviation Law class hope that submitting these few points in reference to the notice of proposed rule making, in reference to harmonization of noise certification standards for propeller-

driven small airplanes, will help out in your decision making process. We feel that complying with Europe's noise certification standards of testing at maximum power for propeller driven aircraft will decrease the potential upgraded or newly manufactured performance of the aircraft in the United States that are currently tested at maximum sustained power. The proposal, if approved will also not make it economical for our aging airplanes to obtain what we see as eventually needed upgrades with a newer engine or propeller package that would meet these noise certifications. Furthermore, the cost of these performance upgrades would only add to the high and increasing cost of flying. Finally, propeller driven airplanes manufactured and sold in the United States that meet our current criteria for noise certification have a very slim chance of ever flying over Europe and therefore need not comply, or "harmonize" with there noise certifications.

Respectfully sent:

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