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Manufacturers of Fine Stol Aircraft

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Docket Management Facility
U.S. Department of Transportation
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Washington, DC 20590-001

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DEPT. OF TRANSPORTATION
POSTNETS

Subject: Docket No. FAA-2004-17041-12

Dear Sirs,

Maule Air, Inc. is a manufacturer of single-engine propeller-driven general aviation aircraft which are subject to compliance with the 14 CFR Part 36, Appendix G Noise Regulation. Our previous certification approvals were to amendment 36-16.

Subsequent amendments 36-22 and 36-54 have changed the microphone position and the noise limit graph (Figure G2) so that evaluation of the effect of the proposed (more stringent) noise limit is not a straightforward comparison.

However, an analysis of Maule noise levels, when modified by the changes in amendments 36-22 and 36-54 indicates that several of the existing FAA approved Maule engine-propeller combinations would have noise levels that exceed the more stringent limit in this proposed rule.

Contrary to the conclusion of the Montreal Task Group, the proposed noise limit appears, in some cases, to be below current noise abatement technology that is available to single-engine propeller-driven aircraft manufacturers. While compliance with the revised rule might be achieved by placing operating limitations on the airplane, this is highly undesirable. (Some Maule models delivered to European countries have required this sort of limitation.) The STOL capability of the Maule airplane necessitates takeoff and climb at full power, and such limitations have a negative impact on performance-oriented customers with resultant loss of business. Maule Air, Inc. strongly recommends that the noise limit not be reduced for single-engine airplanes (Ref. Sec. G36.301(c)).

Very truly yours,
Maule Air, Inc.

June D. Maule
President

Its Performance That Counts