

Response to: Docket No. FAA-2004-17041

April 2, 2004

This NPRM recommends that the noise limit for propeller driven single engine aircraft be changed. This change would decrease the current decibel limit by 3 to 6 dB, depending on the weight of the aircraft. As stated in the proposal the reasoning for this change to regulation is to harmonize noise certification standards for airplanes certified in the United States and the European Joint Authorities (JAA) which would simplify airworthiness approvals for import and export purposes.

I am against this proposal for various reasons. The reasoning behind this change of regulation is not for the right reasons. This idea has been adopted not to better the aviation industry by decreasing noise pollution and achieving more public approval of small aircraft flights in their area, which can be done by new noise abatement procedures at different airports. This change has been adopted for trade purposes which may be important to industry, but in my opinion can be achieved by the companies who are selling internationally to change the standards in which they produce their aircraft, engines, or propellers to meet the international standards.

It appears that small single engine aircraft are being singled out here. A large jet aircraft produces a lot more noise pollution than a single engine aircraft on takeoff which leads me to believe that if this were an issue of noise pollution that multi-engine and jet aircraft would also be included. For flight schools and small aircraft owners this would be a large financial burden to make mechanical changes to their aircraft to meet the new regulation which would lead to an increase in flight training cost, which are already expensive enough, and possibly cause aircraft owners to have to sell their aircraft. It has also been brought up that a supplemental type certificate can be obtained but that also costs money and is an unneeded burden that these people will go through.

It was addressed in the original copy of the NPRM that most new aircraft already meet these standards. A proposal that I have is to make all aircraft produced before this regulation change to be grand fathered in and exempt from meeting the more stringent noise requirement.

Thank you for the opportunity to respond.

Sincerely,

Nicholas F. Hein
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