

I am writing to recommend the proposed harmonization and resulting regulations exempt aircraft certified prior to an effective date of this rule or prior December 22, 1988. Requiring the older aircraft to meet another standard would be expensive, unproductive in all but a few cases and unsafe for pilots, passengers and other members of the public. Even the proposed rulemaking contradicts itself by first stating some "airplanes may have to perform a new noise test," followed by "the FAA does not foresee any circumstances in which these older airplanes would need to recertify for noise."

In the case of Cessna 180s and 185s, these aircraft are typically obtained for their unique capabilities (performance) and commonly operate in unpopulated or sparsely populated areas. In the proposed rule, owners of these aircraft who make safety or utility modifications and or the manufacturers may face extraordinary expenses of noise testing. Examples of safety or utility modifications include: new propellers manufactured with improved materials or designs, exhaust systems, fuel delivery systems, aerodynamic modifications and others. The additional testing may result in unnecessary, prolonged or even permanent grounding of some aircraft. The expenses associated with testing and/or loss of utility could easily exceed \$100 million.

Please exempt aircraft certified prior to the effective date of this rule, or at least prior to December 22, 1988 from this regulation. It is the most equitable course, and will not appreciably frustrate the desire to harmonize certification requirements for newer aircraft.