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Cessna Pilots Association Comments to Noise Stringency Increase for Single-Engine Propeller-Driven Aircraft

After reading through the NPRM Cessna Pilots Association (CPA) feels making any new production aircraft meet the lower noise standards is not an issue. Making the earlier, CAR3 and Part 23 certified aircraft meet the new standard as part of any STC change should not be adopted. This would add more cost to the STC process for any company considering developing a product improvement, either propeller or engine to one of the earlier model aircraft. Those additional costs to achieve the new noise standard very well may make the STC unaffordable to the aviation community and thereby unprofitable to the company that is considering developing the STC. Since many of the older aircraft have engines and propellers that are no longer being supported by the original equipment manufacturer, new product development by after market aviation companies is critical to ensuring these aircraft can remain in service in an airworthy condition.

In the Cessna model line for example, larger engine and three bladed prop STCs allow the 180, 185 fleet to operate at lower noise levels than when the aircraft were first produced by Cessna. If the new noise level standards were applied to these STCs, they probably would not have been developed due the increased cost to comply with the standard. If they had been developed, those higher costs would make the STCs less marketable or even cost prohibitive to the aircraft owner even though they would improve the aircraft performance and enhance safety.

CPA feels the new standards should not be applied to any STCs developed for aircraft that were certified under the old noise level standards. Doing so would hinder product improvement for these aircraft, which many in the near future will rely on to replace nonsupported engines and propellers.

Respectively submitted,
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Technical Representative