

Comment Issue No. 2: The Life Limit for Airplanes With Strengthened Wings Should Be 5,500 Hours Time-in-Service (TIS)*What Is the Commenter's Concern?*

One commenter states that the life limit for airplanes with the strengthened wings should be 5,500 hours TIS. We infer that the commenter wants the NPRM changed to reflect this.

What Is FAA's Response to the Concern?

We partially concur. The life limit for the affected airplanes with strengthened wings is 5,500 hours TIS while operated in the Normal category. The life limit for these airplanes in the Utility and Acrobatic categories is 450 hours TIS. After the sum of time in the Utility and Acrobatic categories equals 450 hours TIS or within 90 days after the effective date of the AD (whichever occurs later), you may only operate the airplane in the Normal category until the accumulation of 5,500 hours TIS. Utility and Acrobatic category operation would be prohibited until the installation of new wings.

The life limits for Utility and Acrobatic category operation and Normal category operation would start over again after replacement of the wings.

We are not changing the final rule AD action as a result of this comment.

Comment Issue No. 3: Allow a Life Limit Extension Through Installation of the AMU1 Monitoring Unit*What Is the Commenters' Concern?*

Several commenters request that FAA change the NPRM to allow those airplanes that incorporate the strengthened wings to operate past 450 hours TIS in the Utility and Acrobatic categories if an AMU1 (acceleration monitoring unit) is installed. The commenters state that this unit regularly monitors the load factors on the primary structure and evaluates the measured load spectrum and collates it with the CAA-FAA and ZLIN-A spectrums. The commenters feel that this AMU1 unit has had an indisputable and substantial impact on increasing the safe fatigue life on the Model Z-242L airplanes.

What Is FAA's Response to the Concern?

We do not concur that the AMU1 unit should be part of the proposed AD. The CAA CZ examined all the available data and decided that these airplanes should be life limited to the levels described in the NPRM.

We have determined that these life limit values are valid and that allowing all airplanes to exceed these values through the use of an acceleration

monitoring unit does not address the unsafe condition. The FAA will evaluate requests for this option on an individual basis and may issue alternative methods of compliance provided the request is made in accordance with the procedures in paragraph (e) of the AD and provides a level of safety acceptable to FAA.

We are not changing the final rule AD action as a result of this comment.

Comment Issue No. 4: Allow Moravan to Extend the Life Limits on a Case-by-Case Basis*What Is the Commenters' Concern?*

Several commenters state that Moravan has the capability of approving the data from the acceleration monitoring unit and allowing continued operation past the specified life limits. The commenters further state that Moravan recognizes the information from both the AMU1 unit and the Corsa Data Acquisition System (CDAS) in allowing the affected airplanes to operate past the 450-hour TIS life limit in the Utility and Acrobatic categories and operate to the 5,500-hour TIS Normal category life limit.

The commenters suggest that FAA give Moravan the authority to allow the affected airplane operators to operate past the Utility and Acrobatic life limit categories.

What Is FAA's Response to the Concern?

We do not concur. As earlier stated, the CAA CZ examined all the available data and decided that these airplanes should be life limited to the levels described in the NPRM. We have determined that these life limits are valid.

The FAA is not allowed to delegate its rulemaking authority to an aircraft manufacturer. Allowing Moravan to determine whether an airplane can exceed these values through the use of an AMU1 or CDAS would be the same as delegating our rulemaking authority.

We will evaluate requests for this option on an individual basis and may issue alternative methods of compliance provided the request is found to be at a level of safety acceptable to FAA and is made in accordance with the procedures in paragraph (e) of the AD.

We are not changing the final rule AD action as a result of this comment.

Comment Issue No. 5: Allow a Root Wing Modification*What Is the Commenter's Concern?*

One commenter recommends that FAA add the option of incorporating a wing root modification to allow operation in the Utility and Acrobatic

categories to 3,500 hours TIS. This is for airplanes with unstrengthened wings that are not eligible for the AMU1 method to increase operation to the 5,500 hours TIS.

What Is FAA's Response to the Concern?

We do not concur. As earlier stated, the CAA CZ examined all the available data and decided that these airplanes should be life limited to the levels described in the NPRM. We have determined that these life limits are valid.

Moravan has superseded the service bulletin that incorporated the referenced root wing modification, and the CAA CZ does not have current AD action that references this root wing modification. The FAA has examined all of the information available from CAA CZ and has determined that the root wing modification is not a valid option for this AD action.

We are not changing the final rule AD action as a result of this comment.

Comment Issue No. 6: The Model Z-242L Airplanes Should Either Be Eliminated From the AD or Not Have Utility and Acrobatic Category Life Limit Restrictions*What Is the Commenters' Concern?*

Several comments state that both the CAA CZ and FAA have approved fatigue testing done on 3 Model Z242L airplanes that shows that the airplanes can be operated to 5,500 hours TIS without any life limits on Utility or Acrobatic category operations. These commenters recommend that we remove the Utility and Acrobatic category life limit requirement from the AD for the Model Z-242L airplanes.

Another commenter states that the service history on this subject matter is only for the earlier manufactured airplane models and no data exists for the Model Z-242L airplanes. The airplane models that the commenter refers to are not certificated for operation in the United States. This commenter recommends that FAA withdraw the NPRM.

One commenter states that the proposed AD action is based on an accident of a Model Z-142 airplane (not certificated in the United States) in Australia. The commenter points out that the wing on the Model Z-242L has a totally different design and should not be affected by the subject matter in this AD. The commenter proposes that FAA withdraw the NPRM.

What Is FAA's Response to the Concern?

The FAA does not concur that the Model Z-242L airplanes should be