

Response to NPRM

Docket No. FAA-2012-0002; Directorate Identifier 2011-NE-42-AD, RIN2120-AA64

I am responding as Technical Director of a over 1400 member owners group, The Twin Cessna Flyer, as well as an active DOM for a maintenance facility specializing in the maintenance of nearly 200 piston twin Cessna's annually. I have over 35 years of experience working on aircraft piston engines equipped with cylinders of all the various manufactures. Many of the aircraft I currently maintain are equipped with the ECi cylinders that are the subject of this NPRM.

Having responded to the previous NPRM much of the same arguments still exist as given at that time.

The modification in time frame for compliance has not mitigated any of these initial concerns.

To reiterate the largest of these

Cost:

Cost analysis and impact to owners is grossly understated both from a labor and parts cost standpoint. As previously stated Cessna aircraft flat rate dictates 24 hours for 6 cylinder change far above the stated 18 hr. This alone accounts for a \$3,000,000 plus underestimation. Coupled with a very minimalist parts costing this number can easily grow to \$5 million or more.

Realistic costing is dictated and in this case not met.

Risk for Maintenance Errors:

In your discussion it was stated that "Our regulatory framework presumes that maintenance will be performed correctly.." Using this same logic would not certified personnel inspection be capable of detection of minor cracking using numerous, well established, and well-defined inspection procedures? All of these criteria exist and our experience has been that medium level of detailed inspection can easily identify minor cracking long before head separation.

Alternatives:

It seems preposterous to ignore the NTSB recommendations in their Nov, 5 2013 reply. This agency is tasked with identifying and recommending mitigation of safety issues, at that time noted to "Required repetitive inspection of ECi cylinder assemblies" and "removal of these cylinders assemblies once they reach engines manufactures TBO"

I feel strongly that a equal level of safety could be obtained by mandating:

- A) Reoccurring (60 hr.) cylinder inspection, consisting of compression checks, pressure soap spray inspection, and visual

examination with required removal any time a crack is identified.

- B) Additionally at any time the affected cylinders are removed from the engine, for any reason, they are prohibited from repair, overhaul, or reinstallation in any certified engine application.

Conclusion:

It is this commenter opinion, gained from numerous industry experts, extensive personal experience, and NTSB recommendations that this alternative, or similar action, should be considered to reduce the impact on owner operators and still offer a equal level of safety.

Tony Saxton

Director of Tech Support – The Twin Cessna Flyer.