

To: Wess Rouse
Title: Small Airplane Project Manager

Dear Mr. Rouse,

Re: the proposed AD on American Champion aircraft regarding the swaging of Nicropress fittings. Also review of Service Letter 427 from American Champion Aircraft. SL427 appears to have been initiated because of a recent ACAC factory error, not a general in-the-field maintenance problem. Further, ACAC SL427 is addressed specifically to aircraft with 250 hours or less time-in-service, suggesting the factory has a hint that the problem was in-house and affects only newer airframes. This appears to related to aircraft manufactured or serviced by or at ACAC...

Since my aircraft is a 1974 Bellanca Scout 8GCBC...(type certificate later acquired by ACAC), and my aircraft was totally rebuilt in 1999 with all new hardware installed at that time, including elevator, rudder, aileron and flap controls per I/A/W Bellanca Scout Manual, (manual dated May 1, 1979 and AC 43.13.1 Chapter 1, Section 2), and the fact that this aircraft has flown a total of 2169 hours since that time without any control problems or incidences, it appears that my aircraft model is not affected by this AD. But I would like to make note of the fact that all 8GCBC Scout aircraft are not certified for aerobatic flight, and the 8GCBC is required to be placarded with the warning "Acrobatic Flight Prohibited" and a limitation listing such is included in the Pilot's Operating Handbook (POH).

So, noting this, how does the FAA digest ACAC's Nicopress error, then decide on an AD requiring 100% inspection of every swage fitting in the 8GCBC Scout fleet? These are not aircraft that are at-risk for catastrophic failure during normal flight and are not operated in aerobatic flight perimeters. These planes are as sound as careful proper FAA-mandated maintenance and annual inspections can make them, and an AD is very expensive remedy to all small airplane owners. It is my opinion that a better way to handle this problem would have been an advisory bulletin not an exorbitantly expensive AD. I also believe that the inclusion of the Model 8GCBC in this AD is another extreme example of FAA oversight and its proposal offers absolutely no protection and is a waste of aircraft owners' time and money. This AD is ridiculous until you include the ENTIRE General Aviation fleet that uses control cables.