

DEPARTMENT OF
TRANSPORTATION
DOCKET OPERATIONS

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July 1, 2011
In Reply, Refer To:
L390-11-1647

U.S. Department of Transportation, Docket Operations, M-30
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE.
Washington, DC 20590
(Fax: 202-493-2251)

SUBJECT: Docket No. FAA-2011-0562; Directorate Identifier 2011-CE-015-AD; Cessna Aircraft Company 310, 320, 340, 401, 402, 411, 414, and 421 Airplanes.

Dear Sir/Madam:

Below, please find Cessna Aircraft Company's comments regarding Docket No. FAA-2011-0562.

This proposed AD would require the installation of two placards on the listed models of Cessna airplanes. Both placards are to be installed on airplanes with de-ice equipment installed that are not certified for flight into known icing. One placard would state that flight into known icing conditions is prohibited. The other placard would instruct pilots to increase approach speed by 15 knots (17 mph) during or after an inadvertent icing encounter.

BACKGROUND

Cessna has addressed the first placard in our service bulletin MEB97-4. This 1997 "Mandatory" Cessna Service Bulletin installs a placard which states "flight into known icing conditions is prohibited." This bulletin was published to clarify for owners and operators of affected Cessna Multi Engine airplanes, while their airplane may have the optional inadvertent de-ice equipment installed, it is not certified for flight into known icing.

Cessna's recommendations regarding operations during or after an inadvertent icing encounter are published in the Pilot's Operating Handbook (POH) and the Pilot Safety and Warning Supplements (PSWS, document D5139-13).

RESPONSE

Cessna supports FAA issuance of an AD mandating accomplishment of MEB97-4. This service bulletin fulfills the requirements of the AD as outlined in the NPRM regarding installation of a placard to prohibit flight into known icing on airplanes not specifically approved for such operations.

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Cessna does not support installation of a second placard for increased approach airspeed when or after inadvertent icing is encountered. Cessna believes any potential confusion regarding whether the airplane is approved for flight into known icing is resolved by accomplishment of MEB97-4 and installation of the above referenced placard. This placard, when combined with the information published in the POH and PSWS, provides appropriate guidance to pilots for dealing with icing conditions, including inadvertent icing.

Cessna finds it unclear from the NPRM how many of the 51 reported mishaps were directly attributed to continued flight in icing conditions by airplanes not properly equipped or certified for flight into these conditions. It is also unclear how many of these mishaps might have been prevented if the placard defined in MEB97-4 had been installed.

Flight into icing conditions by aircraft not approved for icing is an industry-wide issue and therefore needs to be considered in a much more "global" context than is presented in this NPRM. To this end, we recommend that the FAA address this issue through publication of a document such as a Safety Alert for Operators (SAFO), Information for Operators (InFO), Advisory Circular (AC), Special Airworthiness Information Bulletin (SAIB), or supplement to the Airman's Information Manual (AIM).

If you have any comments or need additional information, please do not hesitate to contact Dan McPartland at dmcpartland@cessna.textron.com, or by calling Dan directly at (316) 517-3971.

Sincerely,



For
Kim Hackett,
TC ODA Administrator,
Cessna Aircraft Company
ODA-100129-CE

Cc: Linda Dicken – Program Mngr. ICT ACO, Jason Brys – Flight Test Engineer ICT ACO, Brian Richardet – Cessna Project Engineer.

