

Bruce K. Oberstar

Aircraft Owner/ Pilot

Grumman Traveler AA5-0785

1-12-2022

Comments for Proposed AD-2021-00495-A3

The proposed rule, Docket No. FAA-2021-1017, Project Identifier AD-2021-00495-A3 , affects True Flight Holdings LLC Airplanes, better known as Grumman Aircraft.

I have been a pilot for 38 years and an aircraft owner over 21 years. Both aircraft I have owned are Grumman AA5 Travelers (1972 & 1975), the same as the aircraft that had the elevator hinge separation in January 2021. I have worked under a Grumman A&P mechanic performing owner assisted 100 hour/ annual inspections on AA5x aircraft for over 21 years. I have personal experience relating to delamination in that both my planes have had minor delamination of a wing skin area, as both times I found the delamination during preflight of the aircraft. Both cases I brought the issue to the attention of my A&P, assessed the areas for repair, which per Grumman American SK-125 were minor repairs, and made the necessary repairs before further flight.

I understand why the FAA is proposing a recurring AD for delamination on the Grumman airframe in order to promote proper maintenance procedures by non-Grumman mechanics. I disagree with the instructions that the entire airframe have to have the bond line areas 100% 'tap' tested. I cringe on the thoughts of what damage to the paint and metal surface could be caused by 100% tap testing every annual. The hinge plate mounting design for the elevator and rudder on the AA1 and AA5 aircraft would be the only area in my experience that might benefit from a more thorough inspection for delamination by tap testing, as the elevator hinge was the subject of AD 2021-14-12. These hinge locations (elevator-rudder) are the only area on the Grumman AA1 and AA5 airframe that rely more on 'surface' skin bonding to add strength to the mounting rib. The control surfaces adjacent to the wings on all AA1 & AA5x aircraft are NOT dependent on the bonded skin for structural strength.

My local FBO maintenance shop is charging \$100/ hour which would add \$600 to \$800 to the cost of my annual (this would be a task from the IA). This would be a huge labor cost increase at every annual on my AA5! No aircraft owner wants an AD on his aircraft which devalues it plus add huge maintenance expense. I'm not opposed to having special service bulletins to ensure that proper maintenance on the Grummans will be addressed. I also disagree that the proposed AD would include AA5A's and AA5B's which have completely different (and better) elevator hinge mounting designs. Nothing like the failed hinge plate of the subject Grumman Traveler that AD 2021-14-12 is based on.

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