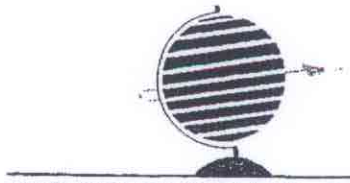


INTERCONTINENTAL JET, INC.

September 9, 2005

Dough Rudolph, Aerospace Engineer
Small Airplane Directorate
FAA
901 Locust Street, Room 301
Kansas City, MO 64106
Fax: 816-329-4090

Dear Mr. Rudolph,

I am the largest owner/operator of MU-2 aircraft, as well as being the largest Authorized Service Center for MU-2 aircraft (our facility directly supports approximately 175 different MU-2's per year).

I have been associated with the MU-2 since 1971 (both as an employee of Mitsubishi and as an owner/operator) and, while not personally a pilot, I have 12 pilots on staff and they fly over 5,000 hours per year.

In addition to operating MU-2 aircraft in various applications, I also buy, sell and lease MU-2 aircraft.

Through the years it has been my experience the MU-2 has no controllability problems. I've researched this matter with my pilots, a variety of customers, and other MU-2 operators. I have not found anyone who has ever had any control issues.

In reviewing the history of the MU-2's, especially related to accidents, I have noted the "common thread" to the accidents seems to center around the issues of training; either lack thereof, lack of completion, and/or the quality of training.

Properly trained pilots who: a.) take their jobs as pilots seriously; b.) fly properly maintained aircraft; seem to have no problems with the MU-2.

3322 N. 74th E. AVE.
TULSA, OKLAHOMA 74115
HANGAR 27
918 / 834-8888
FAX: 918 / 834-1751

I remain irritated and confused as to why the FAA is once again succumbing to political pressure from individuals who know little or nothing about the product and who most likely are tied to a plaintiff's attorney to perform yet another review of the MU-2.

Rather than chasing the MU-2, why don't you go after aircraft which have known structural issues? Why not spend your time reviewing questionable maintenance facilities?

Look at the last few accidents and determine how, when, where, etc. they received training and performed maintenance, and then draw your conclusions.

Sincerely,

Bob Kidd
President/Intercontinental Jet, Inc.

[redacted]

[redacted]

Doug Randolph
Aerospace Engineer
Small Airplane Directorate
ACE-112
901 Locust Street, Room 301
Kansas City, MO 64106

Ref: MU2-B

Dear Doug,

This is in response to your request for comments on the MU-2.I do not have a lot of flying experience in the plane but can tell you what I have learned. I have been flying since 1978 and have flown close to 20 different airplanes and helicopters. Two years ago I started flying for the [redacted] in their airborne extridition dept. We were using a 1970 Navajo and last year we had a chance to up grade to a turbo prop. We spent 8 months looking at all the makes and models both in production and out of production and finally settled on a 1974 MU2 J .What we learned was, Mitsubishi has excellent factory support and parts availability ,well trained service centers and great training at Simcom.

As far as flying the plane we went to Simcom for training then had a highly experienced instructor pilot fly with us. I learned this is a very stable easy to fly plane. It flies a lot like a Lear with props; we have never had any controllability problems, maintenance or support problems. The plane is built more like an airliner or military aircraft than the typical Cessna.

We have been flying almost a year now and have been very pleased with this airplane, with no surprises or problems in controll, handling, maintaince, parts or support.

I do feel like this is a high performance airplane much like a Lear.I do not think a normal pilot can fly this aircraft with out proper training such as Simcom with out getting in trouble. There are things you can do in the sim that you can not safely do in the aircraft, probably something that has caused some accidents, like the ones at Centennial.

So in closing this is one of the greatest aircraft ever built way ahead of its time, has had no major airframe problems or spar problems, has the best factory support for the aircraft and owner operator.

So grounding this aircraft I feel is Un justified in my opinion, maybe mandatory sim training could help.

Sincerely

[redacted]

[redacted] TO Doug Rudolph

From [redacted]

I was Just Wanting TO Let you Know that I have Been Fling MU2's for about 6 years Now I fly about 500 hrs a year in one I Never have had any Problems with one. I will agree that a Person Needs TO be Trained in one They Do fly a Little Different Than any other airPlane But They fly Great! Why are They Concurned about MU2. Why NOT Cessena? 421's? Conquest? They Crashed There TO! If you have any questions Please feel free TO Call.

W. [redacted]

Thanks

[redacted]

Cebolla, Inc.

P. O. Box 518
Pharr, TX 78577
(956) 787-8593
(956) 787-2560 Fax

September 9, 2005

Mr. Doug Rudolph
FAA Small Airplane Directorate

Re: Safety Evaluation Investigation Mitsubishi MU – 2B

Dear Mr. Rudolph:

Please accept this letter as my response to your request regarding owner/pilot feedback on the MU-2 aircraft. I own [redacted], 1980 MU2-60 Marquise, [redacted].

My background in general aviation dates back to receiving my private pilot's license in March 1979. My subsequent ratings of multi, instrument and commercial ratings were acquired within the next 18 months. My total time is 2600 hrs with almost 2400 hrs multi. Since August 2001, I have put over 600 hrs in an Aero Star Superstar 700 averaging over 250 hrs a year in the Aerostar and 250 hrs. in the last 9 months in MU2-60 Marquise.

Before acquiring [redacted], I attended Reece Howell's MU2 training classes. I attended the classes for the sole purpose of learning about the aircraft from the inside out. My approach was

to determine if all of the "horror" stories I had heard over the years were in fact true. I can tell you I was going to buy a turbo prop aircraft. My personality slants very heavily to "detail-itis". I was determined to acquire as much information on the various aircrafts and make a truly, informed decision. As a footnote, we were also looking at the Twin Commander's, Cheyenne's, King Air's and Cessna's.

After leaving Reece's school, I was 100% convinced the MU2 was the aircraft for us. I saw how the aircraft was built, its systems and how the airplane flew through various flight envelopes.

Two weeks after Reece's school and I attended SIMCOM in Orlando, Fl. I attended this school so I could once again go over the aircraft systems, ground school and to acquire approximately 10 hours of simulator time in the only MU2 flight training device in the U.S. prior to taking delivery of [redacted].

Interestingly enough, most people attend these classes once every 6 months to once a year. I had attended two complete ground schools within 3 weeks. At SIMCOM, I was able, through the simulator, to experience various scenarios that are difficult, if not impossible to re-create in an aircraft. Once again, upon leaving SIMCOM, I was convinced in having made the right and best decision on the MU2.

After purchasing the aircraft, I was required to get an additional 15 hours of training with a certified MU2 instructor prior to carrying passengers. I obtained those hours with Mr. Tom Batchelor of Conroe, TX. Mr. Batchelor's experience exceeds 15, 000 hrs MU2 time.

The training I received prior to delivery exceeded most transitioning pilots by a very large degree.

Once again, in the last 9 months, I have flown over 250 hours in MU2's. With over 245 hours in my plane alone. Our flights range from 200 miles to flights of over 1500 miles. We have on going operations in Mexico, Texas, New Mexico, California, and Washington as well as customers in almost every state in the union.

As matter of safety, I feel the MU2, is by far, one the safest and strongest aircrafts out there. **Any aircraft**, if improperly, maintained and if the pilot is improperly trained is very dangerous. I believe with Proper training + Proper maintenance + Proper Flight Planning + Proper Execution = Successful Flight.

I value every person's life that flies on my plane; however, the life I value the most is my own. If I felt that in any way, my life, my wife's, my children's, my brother's, my mom's or any of my customer's lives were in any way comprised by flying in the MU2, the plane would never come out of the hanger.

I appreciate the concerns that are expressed over aviation safety. However, when people "in power" are ignorant as to the facts and yet continue to express "opinions" about a subject or a particular aircraft that, they themselves, have no personal knowledge or history, it frustrates not only the affected pilots and owners of MU2's as well as other pilots and owners of all aircraft.

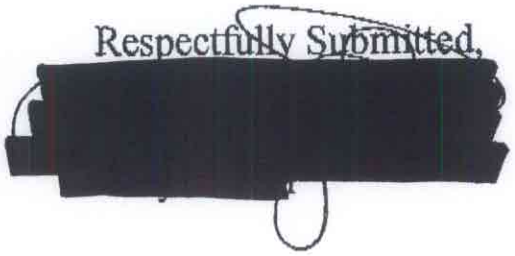
In any accident, INVESTIGATE, DETERMINE and COMMUNICATE.

I would ask, Mr. Rudolph, to first investigate the accident at hand. To see, if in fact, this type of accident has occurred at or in other Denver area airports, to rule out other possibilities of causation. Look for a common denominator in the type of accidents and not focus mainly on the aircraft itself.

The history of the MU2 is loud. But please remember that loud does not equal bad. There have been accidents, but I believe with each accident the MU2 position has been pro-active to prevent repeats. I further believe that the following should be identified as contributing or causing factors: poor maintenance, poor equipment, poor training and/or ultimately poor judgment. The cause should be identified and fixed. I do not believe an aircraft should be grounded that has been flying for over 30 years. Obviously, it can fly.

In closing, Mr. Rudolph, my airplane is a very important tool in my business. It would have a highly dramatic and negative impact on my business if my plane was to be grounded.

Respectfully Submitted,



[redacted]

[redacted]

Sept 11, 2005

Mr. Doug Rudolph
Aerospace Engineer
Small Airplane Directorate
Dept ACB-112
901 Locust Street Room 301
Kansas City MO. 64106

Dear Sir,

This is in response to the Airworthiness Concern Sheet recently released regarding the Mitsubishi MU-2 aircraft. I am an owner operator of a 1978 Mitsubishi MU-2 P model which I have operated since 1996. I have been flying since 1971 when I began flight training as a teenager. I now have over 4000 hours total time of which over 1300 hours is in the MU-2. I hold an ATP rating with both single and multiengine land and sea ratings and I am type rated in a Grumman Albatros G-111 flying boat.

When I transitioned to the MU-2 I immediately recognized the need for formal flight training due to the high performance nature of the airplane. Even before I purchased the airplane I attended the 1996 PROP seminar put on by Mitsubishi Heavy Industries and its' subsidiary Turbine Aircraft Services. This seminar has been a very valuable experience and I return every other year as it is offered.

My formal flight training was with Flight Safety International and for the past 3 years I have been doing my annual recurrent training at Simcom Flight Training Center in Orlando.

I have never experienced any controllability issues with the MU-2. It clearly requires handling in accordance with the flight manual (POH) in that the high wing loading and high performance wing require attention to power management, airspeed, flap configuration and establishing a stabilized approach profile in order to safely and comfortably operate the aircraft. I have flown my airplane all over this hemisphere, from coast to coast, and from Northern Canada to Costa Rica, and I do so with the absolute belief that my friends and family are traveling in an extremely well engineered and reliable aircraft.

I have always reviewed the NTSB reports of MU-2 accidents and other than the issues with prop failures in the early 1990's and 1 case of a split flap condition I do not see evidence of aircraft failure causing departure from controlled flight. What I do see is the repeated failure of pilots operating the aircraft outside the recommendations of the POH, and those procedures taught at Recurrent Training Programs and the Mitsubishi sponsored PROP seminars.

It is unfortunate that all MU-2 pilots do not avail themselves of the training resources that are offered. This airplane must be respected and flown with a professional approach and when it is offers it's operator exceptional performance, comfort, and safety.

Your consideration of these thoughts is appreciated.

Respectfully,

[redacted]

Pilot Lis. #[redacted]

[redacted]

September 9, 2005

Mr. Doug Rudolph
FAA Small Airplane Directorate
901 Locust Street Room 301
Kansas City, MO 64106

Dear Sir:

I've read the recent media attention given to the MU-2, resulting from the two unfortunate crashes in Colorado. It concerns me when any aircraft crashes and loss of life occurs, especially one that I fly.

My career started flying for a lumber company in North Carolina, who purchased a MU-2 (F model). I flew this aircraft for six months with just a check out from another pilot. Upon attending Flight Safety I realized how foolish that was. Needless to say I'm a proponent of formal pilot training by an authorized company.

Three years later I was hired by Mitsubishi Aircraft as a Demo Pilot. I flew MU-2's all across the United States, Canada, and Mexico. I also flew all the production aircraft coming off the line at Mitsubishi in San Angelo, Tx. and I also flew for our used aircraft department. I've seen used aircraft that were not maintained, which concerns any pilot. Some pilots choose to fly these aircraft in weather that I wouldn't fly in myself.

After leaving Mitsubishi Aircraft I went to work for a company in Greenville, SC. I have been with this company for over twenty years and we have operated an assortment of aircraft. During that time we have always operated an MU-2, we still own it and fly it on a regular basis.

In twenty-six years of flying MU-2's I have never seen any situations where the MU-2 was unstable with loss of control on the ground or in flight. Now it concerns me when people who are trying to damage the reputation of an aircraft I respect and love to fly.

Sincerely,

[redacted]

COX SMITH MATTHEWS
INCORPORATED
ATTORNEYS + COUNSELORS

[redacted]

EMAIL ADDRESS
[redacted]

September 9, 2005

Mr. Doug Rudolph
Federal Aviation Administration
Small Aircraft Directorate
Department ACE-112
901 Locust Street, Room 301
Kansas City, Missouri 64106

Via U. S. mail, facsimile, and e-mail

Re: Mitsubishi Model MU-2B Airplanes

Dear Mr. Rudolph:

I have received a copy of the Airworthiness Concern Sheet dated September 2, 2005, concerning the safety evaluation investigation of Mitsubishi Model MU-2B Airplanes being conducted by the FAA. I operate a 1976 MU-2B-26 Mitsubishi, popularly known as the M model. I am a practicing trial attorney with over 34 years of experience trying cases including those related to aviation. I have been a pilot since 1974. I have a commercial pilot certificate with instrument, multi-engine, and Lear jet type ratings. I have previously owned in the early 1980's a Mitsubishi K model aircraft. The current Mitsubishi I am piloting is registered as [redacted], serial number [redacted] I have operated this aircraft since December of 1999. I have accumulated over 5,200 hours of flying time with approximately 750 hours in the Mitsubishi aircraft, over 4,100 + multi-engine time. I have flown Lears-23, 24, 28, 35; Citation-500, a Gulfstream II; Beechcraft King Airs, B90, E90, B200; Beechcraft Queen Airs, Beechcraft Barons A-55, B-55, B-58TC, B-58P; Cessna 421, 414, 340; Piper Cheyanne II and III; Piper Navajos; Piper Aztecs and Piper Senecas.

I have not experienced any loss of control incidents in either Mitsubishi that I have operated, either on the ground or in the air. The only loss of control experiences that I have encountered have been in the simulator at either Flight Safety International (Houston) or SimCom's training facility in Orlando, Florida, when tested what to do in such an emergency, in other words, instructor induced. Although I have also trained in the aircraft including engine out and shut down procedures, I did not experience any loss of control.

In my experience, the Mitsubishi is a truly remarkable aircraft in performance, short field capabilities, and load carrying capabilities. It has performed as advertised.

I do want to comment about emergency air speed limitations. My Pilot's Operating Handbook indicates that minimum control speed for [redacted], serial numer[redacted] is as follows:

Flaps 5 degrees ... 100 KIAS

Flaps 20 degrees ... 93 KIAS

It has been my experience with flaps in the 40 degree position for landing, the aircraft can be flown and touch down at or a little bit below 80 knots IAS. Rarely do I use 40 degrees of flaps on approach to landing and almost all approaches are made at 120 KIAS with both engines operative. The use of flaps at 40 degrees should only be attempted once the airfield and a safe landing is assured. Such is the short field/slow flying capabilities of the Mitsubishi aircraft. It has been my habit and I have been taught to always take off with flaps at 20 degrees, although others will argue flaps 5 degrees is also appropriate. I will never rotate the aircraft until I have 105 knots indicated air speed and will, as rapidly as possible, accelerate to 120 knots as a safety precaution. Once the gear is up and the flaps at 5 degrees, I am normally passing through 140 knots. In my experience, the Mitsubishi is an extremely docile aircraft, even on one engine, above 120 knots.

With regard to operating the aircraft with one engine inoperative on an approach to landing, I try to maintain at least 140 knots until a landing is assured. This gives me an extra cushion in the event of the necessity of a single engine go-around. With one engine inoperative, the Mitsubishi decelerates rapidly with a reduction of power on one engine, the same way I have experienced in other turbo props such as the King Air. On short final, I will reduce to 120 knots until landing is assured and then make further reductions in speed in the flare.

Additionally, I have experienced no adverse effect with the Mitsubishi roll design which employs spoilers to cause the aircraft to roll as opposed to ailerons. I have heard others express some concern that using spoilers could kill lift on a wing and contribute to a loss of control at low airspeed. I have never experienced such a problem, and although great food for thought, it has never been shown to be a problem.

I am unaware of any other aircraft that has had to prove itself as airworthy to the FAA more times than has the Mitsubishi MU-2. It has always passed all of the test criteria required by the FAA. Training is certainly important and a key to operating any aircraft safely. I suppose

that my experience with the Lear jet and its incredible speeds has allowed me to respect and handle the speeds associated with the Mitsubishi aircraft. I am aware of the loss of two Mitsubishi aircraft at the Denver Centennial Airport that has brought about this aircraft safety review. I am also aware that there have been other aircraft that have also crashed at Denver's Centennial Airport around the same period of time and yet are not drawing the same attention that the Mitsubishi aircraft is drawing. Whatever multi-engine aircraft a pilot is flying, if he does not maintain a speed above Vmc, he will not be able to control the aircraft. It appears that one of the Mitsubishi's lost at Centennial experienced that problem. The second incident appears to have been, from the report I have seen, controlled flight into terrain. This could happen in any aircraft if the minimum descent altitudes are not adhered to by the pilot. I have not seen anything in the accident report yet that would indicate that the second Centennial accident was a result of a failure in the Mitsubishi aircraft itself.

For your information, most of my maintenance is done at Intercontinental Jet Corporation in Tulsa, Oklahoma. [redacted] has approximately 4,020 hours of total time and is 420 hours out of hot sections and gear extension. The avionics in the aircraft have been upgraded to Garmin 430s and an Avidyne EX-500 multi-function display. I operate the Mitsubishi between 80 and 100 hours per year and used to regularly fly into Denver's Centennial Airport as well as Colorado's Telluride Airport. I have had icing experience in the Mitsubishi and it has handled all icing that I encountered very well. Of course, I normally fly east and west out of San Antonio, Texas and recognize that I am in the warm south.

Mitsubishi Heavy Industries continues to provide the best support in the business for turbo-prop aircrafts that I know of on an aircraft that has ceased production in 1986 or thereabout. I attend the bi-annual PROP Seminar that is sponsored by Mitsubishi and the other aircraft support vendors that is the top of the line, in my opinion. I have also attended engine courses offered by Honeywell that have been put on in conjunction with the PROP seminars at a reduced cost basis.

My final comment is directed at the call for grounding all MU-2 aircraft by Colorado congressmen who I doubt are pilots in the first place and who probably have never flown in the MU-2. The suggestion is ridiculously unreasonable and incongruous. Although the engine had to be shut down on N538EA that crashed at Denver Centennial Airport, all multi-engine pilots, whether MU-2 pilots or not, are trained to safely operate a multi-engine aircraft on one engine. Most multi-engine check rides consist of your demonstrating you are able to fly the aircraft on one engine. In my experience, the MU-2 is no different than any other twin engine aircraft and can be operated safely on one engine if the pilot is properly trained, alert, and accounts for all variables in single engine operations procedures, such as airspeed, altitude, asymmetric thrust,

bank angle, feathering of the prop, etc. All twin engine aircraft while operating on one engine only will lose control if operated below Vmc.

With regard to N454MA, I see no description yet of mechanical failure of the MU-2 systems in the aircraft. Altitude was the issue and the accident may well be described as controlled flight into terrain.

The MU-2 has been a fast, efficient, stable and reliable aircraft for me. I have spared no expense on maintenance and training. Mitsubishi Heavy Industries has generously contributed to safety and training as well at no or very little cost to me.

If you should have any questions concerning the operation of [redacted] or the MU-2 in general, please do not hesitate to contact me at your convenience.

Sincerely,

[redacted]

JPS INDUSTRIES INC.
AND ITS SUBSIDIARIES
P.O. Box 500, Bristol, New Hampshire 03222 • 603-744-6400 Fax: 603-744-3700

[redacted]

September 13, 2005

Doug Randolph
FAA Small Airplane Directorate
Email: doug.randolph@faa.gov
Fax: 816-329-4090

I am writing this letter in response to a fax received on 9/7/05 on behalf of the MU2 fleet and myself.

I am [redacted] for JPS industries, Inc., and have been flying their MU-2B-60 for over 2 years and have accumulated over 930 hours. Prior to my experience with the MU2's, I have flow a variety of corporate, chartered and commercial aircraft and have accumulated career total of 4,000 plus hours.

Given the variety of aircraft I have had the opportunity to fly, I am in a position to compare the MU2's performance and attributes with other aircraft based on first hand experience. All aircraft have unique qualities and characteristics that a pilot must train for that are specific to that craft. The MU2 is not unlike other aircraft in the respect that with proper training, the aircraft can be flown safely in all types of conditions.

In closing, I would like to recognize the FAA's concern for making air travel as safe as possible, however grounding the MU2 fleet based on a unfounded correlation between two unfortunate accidents and the aircraft's level of safety during operation is unjust.

Respectfully

[redacted]

[redacted]

[redacted]

[redacted]

September 12, 2005

Doug Rudolph, Aerospace Engineer, FAA
FAA Small Airplane Directorate
ACE 112, 901 Locust, Room 301
Kansas City, MO 64106

Dear Mr. Rudolph:

I have been flying an MU-2P model, [redacted] for six years and have accumulated over 1500 hours in this particular aircraft. Initial flight training was completed at Flight Safety International, Houston, Texas with three recurrent sessions also completed at this facility. I have also completed three recurrent flight sessions at SimCom, Orlando, Florida and have viewed the icing video on an annual basis. I have also attended three PROP seminars in 2000, 2002, and 2004.

Overall, I have found the training to be very valuable as it relates to the safe operation of an MU-2. Since the plane is based in the Great Lakes region and I fly 12 months per year, this involves quite a bit of experience with both instrument flight conditions and weather. I have found the MU-2 to be a very stable flight platform when flown in instrument flight conditions or icing and have noticed no unusual quirks of the air frame or power plant.

Our particular aircraft is powered by Dash 10 engines which supply ample power at a wide range of altitudes. These engines are extremely reliable and I have not noticed any problems with either engine. The engines as well as the aircraft are meticulously flown in accordance with the Pilot's Operating Handbook.

All maintenance has been performed at a certified Mitsubishi facility including JetAir Corporation, Green Bay, Wisconsin; Intercontinental Jet, Tulsa, Oklahoma; and Epps Aviation, Atlanta, Georgia. It is my opinion that the personnel in each of these facilities are well qualified and extremely professional regarding maintenance of the MU-2.

In summary, I believe this to be an extremely well built and reliable aircraft which can be flown safely by a pilot with a commitment to regular pilot training, proper maintenance of the aircraft at an accredited service center, and a rigorous adherence to the procedures in the Pilot's Operating Handbook.

If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

[redacted]

/rt