September 9, 2005

Mr. Doug Rudolph
Aerospace Engineer
ACE-112
901 Locust Street
Kansas City Mo. 64106

Dear Mr. Rudolph,

This letter is in response to the airworthiness concern sheet regarding the MU2 aircraft.

I have been flying the MU2 since 1969 and have flown these airplanes for 14,000 + hours and I have never experienced any loss of control. However, I have personally observed aircraft that were being flown that I would not consider airworthy. And flown by pilots that should not be flying them.

It is my opinion that the aircraft are very inexpensive to purchase for the type of airplane that they are. Because of this, some people are able to purchase them that cannot afford to maintain them, and they are not going to spend the money for training. Some of these individuals that can pay cash without financing ,never receive training. They are not required to have the insurance, that would be required by a lending institution. It is the insurance company that requires the training. It is amazing that pilots would want to avoid training and it is even more alarming that owners will avoid maintenance. The airplane is so well built that it will continue to operate without continued maintenance. Of course it will only do that for so long.

For years, I used a maintenance facility that was exceptional and then, they stopped working on the MU2, the reason was, that people would defer the discrepancies and the airplane would leave the facility with a list of items that were not repaired.
They would require the owner or his representative to sign a release stating they were deferring the listed items. After a while that facility discontinued working on the MU2.

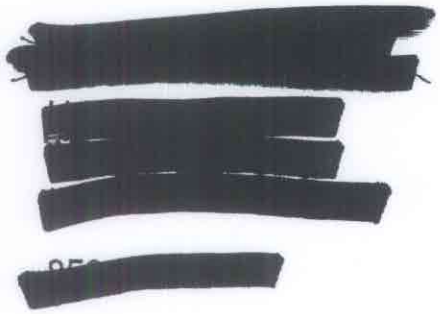
I have personally observed a 100 hr inspection been performed on the grass, without support equipment. (Jacks etc.) and the A&P was operating from his van. That pilot owner attended initial training only. He operated without insurance, therefore, training was not required and not once did he go back for re-current training. That mentality eventually caught up with him, and I am sad to say that he is no longer with us.

I was once hired by a wealthy hotel and restaurant owner to give him instruction in the MU2, that he had just purchased. We were at the Aspen Colorado airport, it was a hot July day. As we were walking up to the FBO I ask him find out and tell me what the density altitude was. His response was, "that is why I bought a MU2 , so that I would not have to worry about that."

There is nothing unsafe about a MU2 that is well maintained and piloted by a well trained pilot.

If I can be of any further assistance, please feel free to contact me.

Sincerely your,



[redacted]

September 9, 2005

[redacted]

Mr. Doug Rudolph
FAA Small Airplane Directorate
ACE-112
901 Locust Street, Room 3o1
Kansas City, MO 64106

Dear Mr. Rudolph:

I just learned that those of us who fly MU2's have been challenged concerning the airworthingness of our aircraft.

I have been flying Mitsubishi's since 1973 and currently have a Solitaire. As for my experience I have flown since 1935. I have been employed by the military, American Airlines and Business Aircraft. I have been a director of the National Business Aircraft Association, a founder of Aircraft Owners and Pilots Association and currently fly my own business interests.

From time to time I hear that MU2's have been challenged for various reasons of safety. My personal evaluation of the aircraft is there is no more airworthy aircraft that is certified by the FAA. I have total confidence in the aircraft provided it is well maintained and flown by current and qualified pilots. As for me, I have always taken regular recurrent training in Flight Safety and Reece Howell.

Tragically there are some pilots that do not take regular training or who do not have the skills regularly evaluated. Without my opportunity to evaluate the cause of the two recent accidents it would be presumptive for me to make a judgment such as has been made by the congressmen. Before giving any validity to the congressmen's allegations I would urge you to first determine their qualifications and experience to evaluate what the NTSB is charged with.

I know of no manufacturer that begins to be as conscientious in providing information and training for pilots who fly their airplanes than Mitsubishi. Personally, I feel it is very irresponsible to make amateurish recommendations. This has already been done regarding ice carrying capabilities and found that the MU2 was a very airworthy aircraft.

As above stated I consider the aircraft completely safe or I would not use it to transport my family.

Sincerely,

[redacted]

[redacted]

152

[redacted]
09/12/2005 02:21 PM

To Doug Rudolph/ACE/FAA@FAA
cc
bcc
Subject MU2 ACS

To: Doug Rudolph (doug.rudolph@faa.gov)

Aerospace Engineer
Federal Aviation Administration
Small Airplane Directorate
ACE-112
901 Locust Street, Room 301
Kansas City, MO 64106

From: MU-2 Aircraft Owners and Operators Association (MAOPA)

Subject: Response to Airworthiness Concern Sheet (ACS) dated September 2, 2005 with response deadline of September 12, 2005.

Date: September 12, 2005

The MU-2 Aircraft Owners and Pilots Association (MAOPA), on behalf of its nearly **400** owners, pilots and operators respectfully requests an extension of the deadline for responding to this ACS. The time period for responses should, at a minimum, be extended by at least 30 days from the current comment deadline so that all owners and operators who may wish to comment have an opportunity to do so.

The MAOPA transmitted via fax and email, as soon as it was brought to our attention, an emergency alert to all its members concerning this ACS. We also immediately started communicating by phone with our members, and did not find any member who had been made aware of the ACS by the FAA or any other source. We at MAOPA only found out about the ACS thru the AOPA, and we are most appreciative of this timely communication. As you know, as a result of our initial efforts, some of our members have already begun to send communications to your attention. We believe our organization, working together with other aviation organizations, has demonstrated the capability to disseminate safety concerns to our members, and serve as a catalyst for timely feedback of technical, cost impact data and other information to the FAA. We need additional time to properly respond to this ACS.

The MAOPA and its members have consistently worked in cooperation with the Federal Aviation Administration (FAA) toward reasonable and effective solutions in the public interest and in the interest of aviation safety. The FAA's stated reason for this air worthiness concern indicates it is a Safety Evaluation Investigation into all areas of the airplane, including airplane design, operation, training, and maintenance. This is a far reaching and extremely broad concern,

and it is most distressing that MU-2 owners and operators have been given so little time to respond.

This 10-day emergency ACS was issued on Friday, Sept 2 and the 10 day timeframe for response included two weekends, including the 3-day Labor Day holiday weekend. By anybody's measure, this extremely short period of response time consisting of only five (5) working days is insufficient given the complexity of the expressed concern and the enormity of its reach.

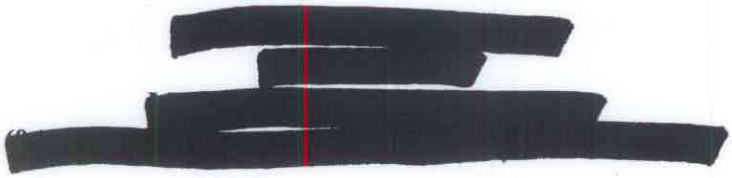
Our organization is also very disappointed that again the FAA seems to be targeting the MU-2B for such seemingly far reaching scrutiny. As you may know, since the 1980s, the MU-2 has repeatedly been subjected to regulatory initiatives and at least three certification reviews. All of these prior reviews; a general certification review; a short body icing review and; a long body icing review have proven the MU2 meets or exceeds all certification requirements.

When the MU2 was introduce in the late 60's and well into the 70's, a new owner would accept delivery at the factory with little or no training. Initially the only competition for this 300 knot aircraft's with its high speed wing was from 200 knot fat wing piston derivatives. The early years of the high performance MU2, like the Learjet, had a higher accident rate. Since then, all aircraft including the MU2 have for a host of reasons seen their accident rate improve over the last 30 to 40 years. A look at the overall accident record for the MU-2 indicates that Part 91 operations have traditionally had the most effect on the overall accident rate mostly because the majority of the aircraft were operated 91 and an early lack of consistent training. As a result, numerous training and other initiatives have been undertaken and implemented. The accident rate has markedly improved over the many years because of the success of these efforts and with the advent of advanced training, insurance training requirements and voluntary additional training such as the biennial Mitsubishi PROP seminars. The PROP seminars have attracted wide, perhaps even disproportionate, attendance by our 91 owners and operators. Moreover, we believe that the most recent 10 or 15 year moving accident rate (per 100,000 miles flown) may be better than most pressurized piston twin aircraft, and very close to some of the similar vintage turboprops.

Recently, the MU2 has seen a higher proportion of its aircraft (probably higher than most other similar aircraft) flying in night Pt 135 operations and its correspondingly higher risk environment. Most of these operations have had in-house training programs that have historically kept their 135 accident rate lower than their 91 counterparts until the anomaly of the recent few years.

In conclusion, the MU-2 Aircraft Owners and Pilots Association on behalf of MU-2 owners, pilots and operators looks forward to working in cooperation with the FAA, AOPA and other interested aviation organizations on this matter. In addition to this letter, we will continue to forward other responses and information from our members that may not have come to your attention.

David Slivka
President
MU2 Aircraft Owners and Pilots Association
561-241-6111



September 13, 2005

Mr. Doug Rudolph
Aerospace Engineer
Small Airplane Director
Dept. ACE-112
901 Locust St., Room 301
Kansas City, MO 64106

FAX: (816) 329-4090

Dear Mr. Rudolph:

I am in receipt of the Airworthiness Concern Sheet dated September 2, 2005 concerning the Mitsubishi Model Mu2B-60.

I have owned and flown a Mu2B-K or a Mu2B-40 aircraft since 1981. I have flown a total of 7850 hours. This includes 6643 hours in multi-engine aircraft and 2857 hours in my Mitsubishi Mu2B-40. I have attended two – five day initial training courses and 25 - three day annual recurrent training courses at Flight Safety International and Simcom training centers.

In reviewing the preliminary reports concerning the two accidents involving the Mu2B-60 aircraft near Centennial Airport in Denver, Colorado, it is my opinion that the accident of December 10, 2004, at night under VFR conditions, was the result of the pilot banking the aircraft too steeply in an attempt to return to the airport at a minimum air speed. The effective wing span was reduced by the cosine of the angle of the bank, subsequently the stall speed was increased. When the inside wing stalled it fell through. This was not because of a deficiency of the aircraft, but a deficiency in the training of the pilot. I have owned an interest near Loveland Pass for many years. There have been six serious airplane accidents in the vicinity. Typically the aircraft would be attempting to cross the divide and as the air density became less and the horse power of the engine became less, the pilot realized he had to turn. The pilots of five of the aircraft tried to turn about, but experienced the same problem described above; low airspeed and steep bank caused the inside wing to stall. The sixth aircraft was the Martin 404 carrying part of the Wichita State football team to Logan, Utah for a game. There were no Mitsubishi aircraft involved in any of these accidents.

I have flown my Mu2B-40 into Centennial Airport many times, day and night. The field elevation is 5000' higher than my home field. The performance and maneuverability of the aircraft has been very satisfactory. In a simulator I have practiced engine out conditions on very hot days at 6000' elevations, similar to APA and have plenty of power and performance margins. I believe the pilot on December 10, 2004 was not properly trained to fly the Mu2 on one engine. A need for annual recurrent training was indicated.

As to the August 4, 2005 flight, the pilot crossed Casse at 7200', 800' below the published crossing altitude. The report stated that the aircraft continued to descend below the glide slope. The tower operator advised shortly before impact, "----check altitude----your altitude indicates six thousand four hundred --- you appear to be well below the glide slope." Again, the aircraft was not the problem.

I understand there have been other recent fatal accidents at APA including a Cessna 421 and a Cessna Conquest. I wonder why two Mu2B accidents triggered this "Safety Review" when the Cessna 421 has higher accident statistics and no such review has been called.

Very truly yours,

Doug Rudolph/ACE/FAA
09/19/2005 02:05 PM

To Brian A Hancock/ACE/FAA@FAA
cc
bcc
Subject Fw: MU2 ACS

please add to the list
----- Forwarded by Doug Rudolph/ACE/FAA on 09/19/2005 02:04 PM -----

[redacted]
09/19/2005 01:49 PM

To Doug Rudolph/ACE/FAA@FAA
cc
Subject MU2 ACS

Mr. Doug Rudolph

Small Airplane Directorate

Departemnt ACE-112

901 Locust Street, Room 301

Kansas City, MO 64106

RE: MU-2B Mitsubishi Airplanes

Dear Mr. Rudolph:

This letter is in response to the FAA ACS date 9/2/5 regarding the MU-2B aircraft.

By way of introduction, I am an ATP rated pilot. I maintain my CFII/MEI certificates and have a total of approximately 6,000 hours total time, presently logging about 700 hours per year as p.i.c.

I am the operator of an MU-2B. I am Senior Captain and Chief Pilot for [redacted] operating a Citation 560. I also enjoy operating in many other makes and models, i.e. Beech Baron, Beech Duke, Beech King Air, Piper Seneca, and numerous smaller Beech, Cessna, and Piper singles. I have experience in single pilot 135 operations as well. I instruct approximately 100 hours per year at all levels, from student pilot initial training to upper end, high performance twin engine aircraft instruction (recurrent and initial training for Beech Duke).

In November of 2004, our business acquired a 1978 MU-2B-26A, a "short-body" MU2. Immediately upon delivery, I completed the required initial training and IOE with Professional Flight Training in Salina, KS. My instructor is Mr. Shawn McDonnell. Because I value training very highly, I voluntarily completed an annual recurrent training session with Mr. McDonnell in May of 2005, (six month cycle).

I have found no problems in adapting to this aircraft. I have accumulated about 200 hours total time, flying in IFR, flying in close proximity to convective weather, conducting winter operations, including occasional flight in light to moderate icing conditions, and find to the contrary of what seems to be opined by those unfamiliar with the aircraft, that the MU2 is extremely stable, consistent, and trustworthy platform. The anti-icing and de-icing systems are robust. The only comment that I could bring to light compared to the other makes and models I fly, is that the aircraft is very trim sensitive, and requires the pilot to be "in harmony" with the phase of flight being conducted. Smooth transitions between phases of flight seem to come effortlessly, provided the pilot keeps focused, and uses normal aeronautical decision making skills and keeps thinking ahead of the aircraft. These are the same skills I use in the other makes and models I fly. Configuration issues are straight forward. Since the aircraft uses a "roll spoiler", certain procedures (i.e. engine-out, or transition from take-off to cruise/climb configuration) are handled with slightly different procedures than aileron aircraft. Also, wing configuration through the full span flap system requires slightly different operational procedures. These procedures are in NO WAY troublesome.

Our engine out drills, during initial and IOE, revealed no handling difficulties with the aircraft. There are some minor procedural differences between the MU2, and in similar and smaller propeller driven aircraft, but these very procedures are roughly similar to operating the Citation. By way of example, engine failure during takeoff, with take-off continued, the pilot does not reconfigure the aircraft, except to trim away the spoiler load to maintain wings level, and establish climb. This is very similar to the procedure in the C560 i.e., "Don't touch the flaps"!

Once the aircraft is clear of obstacles, then gear is retracted and flaps are brought up. The aircraft has a great power to weight ratio, and exhibits satisfactory single engine climb and flight characteristics.

I make a practice of striving for continuous improvement as an airman, and to learn from the mistakes of others. While I am certainly no mishap expert, the incidents which have given rise to this ACS are very similar to reports I have read for other makes and models. It seems there may be some misconceptions among non-operators who do not understand the aircraft. Also, there may be a possibility of training short-comings, or a failure of pilots, once trained, to adhere to accepted procedures for the MU2, that are the real cause of the perceived problems, not the aircraft itself.

On a final note, the aircraft is rugged, reliable, fast and efficient. The passengers who have been aboard our aircraft all comment on the great ride, and enjoy the speed and economy which are the MU2's hallmark. Please contact me at your first convenience should you have any questions about the foregoing.

Sincerely,

[redacted]

[redacted]

September 28, 2005

Mr. Doug Rudolph
FAA Small Airplane Director
Department ACE-112
901 Locust Street, Room 301
Kansas City, Missouri 64106
Email: Doug.Rudolph@FAA.Gov

Dear Mr. Rudolph:

I have been flying our N Model MU-2 [redacted] for five and a half years. I have approximately 1600 hours of MU-2 time in this plane. I have flown this airplane to Europe, Alaska, Canada, Mexico and throughout the United States. I have regular maintenance completed every 100 hours and attend SimCom Flight Training every year.

I am proud to say with proper maintenance and flight training I have experienced no issues including no loss of control issues.

I feel as so many others that if either maintenance or flight training are not kept current that problems will occur. As in any aircraft I do have a concern that many MU-2 Pilots Flying today is without professional flight training annually.

My only suggestion is to make Annual Flight Training mandatory. Maybe a new rating for the MU-2.

Please feel free to contact me via cell phone [redacted]
Extension 13.

Yours truly,

[redacted]

[redacted]

September 7, 2005

[redacted]

Doug Rudolph
FAA Small Airplane Directorate

Dear Mr. Rudolph:

I currently own aircraft N458BB, purchased December 1995. I have flown approximately 1500 hours in this aircraft. I have owned many aircraft prior to this airplane.

It is of my opinion that this aircraft is very well made as far as strength and durability. I have gone through many flight safety courses and training including Reece Howell training class, Flight Safety, and Sim Com in Orlando, FL.

This aircraft, in my opinion, is wonderful in performing in adverse weather conditions, including rain and various types of icing conditions. I further believe that perhaps, in required training, more emphasis should be given in single engine operations training during take off and landing configurations in the simulator.

I have kept this airplane for 10 years because I believe firmly in its reliability and performance. I have taken many people, including family, on extended trips and have no reservations about flying this aircraft in a sensible manner as should all pilots.

It is also my opinion that during IFR conditions during an instrument coupled approach, when dropping the landing gear and deploying the flaps, air speed and altitude should be very closely monitored. A close watch should be taken for any altitude change and low air speed fluctuation that could be hazardous to the flight.

If you require any further information about my experience with this aircraft, flying it under part 91, I can be contacted on my cell [redacted] or by mail [redacted]

[redacted]

Sincerely,

[redacted]

[redacted]

S & S Aviation,
9415 Jet Lane, Suite #2, Easton, MD 21601
tel: 410-829 5712 fax: 410-763 6566

[redacted]

Sep-9-05

FAA Small Airplane Directorate,
Mr. Doug Rudolph,
Dept. ACE-112
901 Locust Street, Room 301,
Kansas City,
MO 64106

Re: Safety Evaluation of the MU-2B

Mail: Priority / Certified / Return Receipt requested

Sir,

In response to the recent Airworthiness Concern Sheet I submit the following comments:

1. As a certificated Airframe and Powerplant Mechanic, as well as the holder of FAA Inspection Authorization it has been my privilege to both maintain and inspect various models of the MU-2B, including the long body "-60" variants that have initiated your "Concern Sheet". In this capacity, I have attended maintenance training courses on both the MU-2B airframe, and the TPE-331 engines.

2. In short I am well qualified to comment on the design and reliability of this aircraft. I could wish that every aircraft was so well-built. In over twenty years in General Aviation I have never seen dispatch reliability that remotely approaches that of the MU-2B. This aircraft is astonishingly well-engineered.

3. In contrast, and specifically regarding the continuity of flight control systems:

/ contd.

1/2

/ contd.

I have seen Piper aircraft with jammed ailerons due to newly installed ill-fitting OEM wingtips. I have seen even more Piper aircraft with reversed elevator trim cables due to Pipers ineptly written maintenance documentation. I have seen low-time Beech aircraft with trim actuators stripped out, just no threads left on jack-screws despite periodic maintenance & lubrication. I have seen Cessna aircraft with rudder cables detached from rudder pedals, due to poor design and pitiful attempts by engineers to save weight on such critical components. An AD and SB search on the "new" single-engine Cessnas reveals a pitiful track record of fasteners being omitted during production, control cables crossed and wrapped around fuel lines during Cessna factory installation and the like, which no doubt continues to this day. I could go on for hours with these comparisons.

There are no defects of this sort on the MU-2B. There is nothing in the design of the MU-2B that would lead a competent pilot to experience flight control problems.

4. Mechanics will of course leave flashlights under floor panels, omit a cotter pin or the like for all sorts of "Human Factors" reasons. Likewise pilots may forget a switch, or even an entire checklist such when fatigued or otherwise distracted. If one omits these sort of incidents, and further omits aircraft operation by inexperienced or otherwise unqualified personnel, a search of the FAA Service Difficulty Reports will endorse my viewpoint that the MU-2B is mechanically a very safe aircraft.

5. Now the MU-2B is of course of a very different design to other GA aircraft but that only behooves maintenance personnel to seek out qualified assistance and training. Support from both MHI and Honeywell in this regard is just outstanding. Service Documentation is frequently updated, is accurate and is readily available.

6. In closure I note that several other aircraft models have recently had problems at Denver. Surely then a review of those aircraft models is also in order? Or perhaps even the airport itself? Appalling wind shear and truculent air traffic controllers are said to be prevalent in that locale. Grubby congress-type persons too, come to think of it.

[redacted]

[redacted] *S & S Aviation LLC.*

B.Sc Electrical Engineering, A&P/IA, Commercial-Multi-Instrument Pilot.

2/2