

# John D. Whitehead

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Mr. Mark Rumizen  
Engine & Propeller Directorate (ANE-100)  
12 New England Executive Park  
Burlington, Massachusetts 01803

RE: Comments to Proposed AC20-24C

Dear Mr Rumizen,

Thank you for offering a two week extension for comments to those of us in the Clean 100 Octane Coalition. I am also a life member of the American Bonanza Society although I write today as an individual with something personal at stake.

I am the owner of a Beech Bonanza with a high compression, turbo normalized engine. This airplane's operation and value would be adversely impacted by a replacement avgas that is not comparable to the real world operational characteristics to the current 100LL. The use of any fuel short of 100LL performance would render my airplane all but useless.

With regard to the revision of AC20-24B, I feel that enacting this revision would inject an unacceptable degree of uncertainty into the applicant process. Case in point:

Section 2, paragraph b, the last sentence reads:

“If we find that following this AC would not result in compliance with the applicable regulations, we will not be bound by this AC, and we may require additional substantiation as the basis for finding compliance.”

If this is your approach then I see no value in having an AC at all. It leaves things open ended such that no one can know the rules of engagement. Thus, many will abstain from innovation similar to the way U.S. Businesses currently are avoiding expanding due to uncertainty about future tax law, health care costs, etc. in the future. Without a rule that can provide an expectation that compliance equals approval, the AC's value is nil. It simply creates subjective interpretation. I hope that isn't the underlying intent.

Further, I have concern that you've outsourced your responsibility to a group of volunteers that only work part-time - The ASTM.

Section 5, b reads in part:

“Historically, the FAA has used the voluntary consensus standards from ASTM International (ASTM) or SAE International (SAE) to identify fuel and oil grades, designations, or specifications that were to be identified on a TCDS.”

The ASTM is fine organization and has a role in the 100LL replacement process but the AC should not be neutered by insisting that this part-time organization slow down progress. Further, this voluntary standard, as you put it, is not within the AC that this amendment proposes to replace. Adding it here creates a mandatory third party and removes the option for the applicant to provide his own proof of concept to the Administrator. It is imperative that a 100LL replacement be available at the pump in a reasonable time frame. If you understand that and understand why that is so important then you must, by default, understand why revising this AC as proposed is detrimental to the applicant process.

AC 20-24B should remain in force and be supported by the very entity that created it – The FAA. The FAA should not abdicate its responsibility in this process. Period.

If a 100LL replacement fuel of equal performance is not introduced in a timely fashion, many airplane owners will stop enhancements, shops will lose business, and new airplane sales will all but cease. The process should be streamlined, not encumbered by bureaucracy as this proposed revision would do.

Sincerely,

John D. Whitehead