



September 9, 2024

The Honorable Jennifer L. Homendy
NTSB Chair
490 L'Enfant Plaza, SW
National Transportation Safety Board
Washington, DC 20594

Subject: Cirrus Submission to CEN22FA405 Tomball, Tx, Cirrus SR22-8750, N420SS

Dear Ms. Homendy:

The fundamental cause of this tragic event was the loss of engine power experienced during an approach to the airport at Tomball, Texas (KDWL), by two experienced pilots flying a factory new SR22 aircraft.

This loss of engine power occurred during good weather with no ATC distractions. The investigation and final NTSB report should therefore be focused on the events that led to the loss of engine power, and the failure of both pilots to recognize that loss of engine power during the last 62 seconds of the flight. Fuel flow data from the Recoverable Data Module (RDM) presented in the NTSB Draft Factual conclusively matches the signature of a mixture control being moved to the cutoff position. There is no evidence in the recorded data, nor in the surviving pilot's statement, that indicated either pilot took any corrective action.

The NTSB Draft Factual report included considerable information from a NTSB requested Cirrus flight test program. This data validated the "signature" of a mixture control movement to cutoff during that final approach segment. This Cirrus flight test data was provided to the NTSB in September 2022.

Proposed Probable Causes and Findings

In accordance with Title 49 CFR 831.14 as a party to this investigation, we propose the following:

Probable Causes

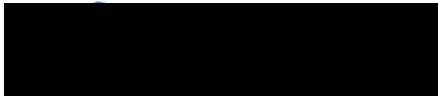
- The sudden loss of engine power at approximately 988 feet above the airport elevation due to a complete loss of fuel flow.
- The failure of either pilot to recognize the loss of engine power and take appropriate corrective action.
- The pilot's failure to maintain adequate airspeed which resulted in a low altitude loss of control.

Proposed Findings

- The loss of engine fuel flow was due to the improper movement of the engine fuel mixture control to cutoff. This mixture control movement was within a one-minute time span that experienced three throttle reductions due to the aircraft being high on the approach path.
- The pilot made three throttle inputs after the loss of engine power without recognizing a lack of engine response or taking appropriate corrective action. Multiple engine indications on both the PFD and MFD were consistent with a total loss of engine power.
- The NTSB investigation conclusively eliminated all fuel system components as a potential cause of the loss of fuel flow.

Cirrus sincerely appreciates the NTSB's efforts in improving general aviation safety, and the NTSB's impartial consideration of this formal submission.

Sincerely,



Chris Glaeser
Director Air Safety
Cirrus Aircraft