

Loyd's

Aviation

Since 1958

57284

September 29, 2017

National Transportation Safety Board
Chairman Robert L. Sumwalt
490 L'Enfant Plaza East, SW
Washington, DC 20594

RE: NTSB Report, Accident #WPR16LA058

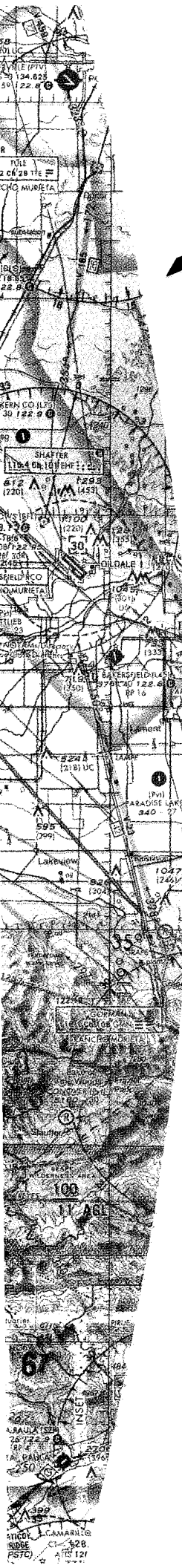
Chairman Sumwalt:

This letter is in response to the NTSB Aviation Accident Final Report, number WPR16LA058, and should be considered a Petition for Reconsideration of Probable Cause. Loyd's Aircraft Maintenance, disagrees with the findings of the NTSB, as outlined below, and in the accompanying statement by Mark Wiebe, Director of Maintenance for Loyd's Aircraft Maintenance.

The NTSB records the Probable Cause and Findings as: "Maintenance personnel's repeated failure to re-rig the main landing gear (MLG) in accordance with the airplane manufacturer's service manual requirements, which resulted in the collapse of the right MLG."

Loyd's Aircraft Maintenance disagrees with the NTSB's findings for the following reasons.

1. The NTSB docket notes in Interview #2 that "Mr. Wiebe added that the re-rigging procedure was also not accomplished after the main landing gear down lock tension was adjusted during annual inspections in 2011, 2012, and 2013." Per Mr. Wiebe's statement (attached), this is not a true statement. In addition, the landing gear down lock tension was not adjusted at the 2011 annual inspection; and whenever the landing gear tension was adjusted, it was done so in accordance with the maintenance manual which prescribes a procedure on page 2A-142 for this exact purpose.
2. The NTSB has not put forth any evidence to support the claim that the rigging of the landing gear was in any way, shape, or form, out of tolerance; or that it caused the accident. In fact, they noted in the Landing Gear Examination Factual Report that the left main landing gear down lock tension was within the manufacturer's limitations. The accident report notes: "According to a representative of the airframe manufacturer, low overcenter tension can cause the aft bell crank and side brace lock link to retract and the landing gear to collapse when the landing gear is under load in the extended position." Again, however, there is no evidence that shows that the overcenter tension was in any way outside the manufacturer's limits.
3. The NTSB failed to note that the PIC knew there was a problem with the landing gear prior to departing KSBA on the day of the accident.



Loyd's

Aviation

Since 1958

4. The NTSB failed to note that the airplane is kept outside in Santa Barbara (KSBA) and, as noted in the logbook entries, has suffered corrosion from the harsh elements. There was never an inspection of the landing gear joints and linkages to see if corrosion within those joint was either a cause, or a contributing factor to the collapse. Corrosion of one or more of the mechanisms can cause drag on the entire landing gear that no cable tension, or motor, can overcome. Given the conditions that the airplane lives in, this corrosion can be extensive, and occur relatively suddenly.

Given the inaccurate statements and incomplete investigation, it seems to me that the findings within the NTSB report cannot be confirmed, and should be revised.

Any inquiries, or requests for further explanation may be directed to myself.

Sincerely,



Ryan Crowl
President
Loyd's Aviation & Loyd's Aircraft Maintenance

9/6/2017

To whom it may concern:

This is in response to the NTSB Final Report concerning Cessna 340A N346MC. We have performed maintenance, preventative maintenance, annual inspections on this aircraft since 2007. On the morning of January 27, 2016 the owner of the aircraft called and said he was going to bring the aircraft to Bakersfield to have us check the landing gear due to problems with the right main. Subsequently the aircraft was damaged on landing here in Bakersfield. The NTSB stated that the cause of the gear collapse was due to our failure to re-rig the landing gear. This is not true. Every annual inspection includes a detailed landing gear inspection, ref chapter 2A-129 of the Cessna 340 Service Manual which states "The following procedures provide detailed inspection instructions for the landing gear system to assure that the system is properly rigged". So when the annual inspection was accomplished, 8/7/2015, the landing gear was in rig. Also in response to the statement on "interview #2 summary" that I said that the maintenance facility had not re-rigged the landing gear since 2007 is also not a correct statement. If the landing gear rigging check per chapter 2A or chapter 4 is accomplished the end result is the same. The landing gear is in rig. This aircraft is based at Santa Barbara Ca and is parked outside. The marine environment can cause corrosion to develop very quickly. The retraction mechanism, especially the over-center lock has no provision for lubrication and can only be lubricated by using an oil can. The NTSB also stated that a safety wire adjustment and a nut of the aft tube was adjusted. These statements do not make any sense. The landing gear rigging inspection involves disconnecting and reconnecting the mechanical assembly. Inboard and outboard gear doors are disconnected. Nose gear doors, down spring and drive tube is disconnected. Main gear up lock hooks and rods are removed. Outboard push-pull tubes are removed. This is just the beginning. The gear is checked from the gearbox actuator internal clearance to the inboard gear door tension. The main gear free fall is checked. Outboard push-pull tubes reinstalled. Main gear drop off is checked. Main gear down tension is checked. Up locks are reinstalled. Nose gear over center force is checked. Nose gear is reconnected and nose gear up and down tension is checked. All doors, down spring, are reconnected. Gear is operated thru several cycles including emergency extension. If at any time the tensions, drop off, over center force is not to spec the adjustments are made in sequence. All parts disconnected or removed are saftied on reinstallation. This is all part of the annual inspection which we complete.

Respectfully,

A black rectangular redaction box covering the signature of Mark W. Wiebe.

Mark W. Wiebe
Director of Maintenance
Lloyd's Aircraft Maintenance