



Federal Aviation Administration

Memorandum

Date: October 23, 2008

To: Manager, Boston ACO, ANE-150

From: Manager, Small Airplane Directorate, ACE-100

Prepared by: Richard B. Noll, ANE-150

Subject: **INFORMATION:** Equivalent Level of Safety (ELOS) Finding for P.K. Floats project on a Sky International series airplanes, FAA Project # ST1299BO-A

ELOS Memo#: ACE-08-20

Regulatory Ref: 14 CFR § 23.777

This memorandum requests your office to review and provide concurrence with the proposed finding of equivalent level of safety (ELOS) for the location of the landing gear control as required by 14 CFR, part 23, § 23.777(e).

Background

An application has been made for installation of P.K. Floats Model 2250A amphibious floats on Sky International (formerly known as Christen Industries, and White International) series airplanes (type certificate A22NM). The applicant indicated that the landing gear control is located approximately 1 inch to the right of centerline of the instrument panel centerline. This is a noncompliance with 14 CFR § 23.777(e) which states that “*the landing gear control must be located to the left of the throttle centerline or pedestal centerline.*” This airplane does not have a pedestal and the throttle control is located next to the left window.

Applicable Regulation:

14 CFR part 23, § 23.777(e), at Amendment 7.

Regulation Requiring an ELOS Finding:

The applicable regulation is:

14 CFR 23.777(e) [Cockpit controls]:

“

(e) The landing gear control must be located to the left of the throttle centerline or pedestal centerline.

....”

Description of Compensating Features:

The Sky International series airplane has a fixed gear, tandem seating, and a centrally located airplane control stick. The P.K. Floats Model 2250A floats are amphibious thereby requiring a landing gear control for extension and retraction. The panel on which the landing gear control is located is mounted beneath the instrument panel forward of the airplane control stick. Although the landing gear control is one inch to the right of the instrument panel centerline, it is within easy reach by either hand of the pilot. It is physically impossible to mount the landing gear control to the left of the throttle centerline.

Explanation of Compliance Features:

The FAA evaluated the location and ease of use of the landing gear control during Type Inspection Authorization (TIA) flight tests. The pilot reported that the landing gear control was within several inches of the airplane control stick and did not require any stretching to reach. The landing gear control was readily accessible and easy to operate. The installation would pose no safety hazard under any operational conditions.

FAA Approval and Documentation of the ELOS Finding:

The Small Airplane Directorate concurs that landing gear control as modified for the installation of P.K. Floats Model 2250A amphibious floats on Sky International series airplanes, (as listed on type certificate A22NM--) provides an equivalent Level of safety to the requirements of 14 CFR, part 23.777(e). This ELOS Memorandum number should be listed in the Limitations and Conditions Section for the STC.

Equivalent Level of Safety Finding has been made for the following regulation:

14 CFR § 23.777(e), Cockpit Controls (documented in ELOS Memorandum ACE-08-20)

John Colomy
 Manager, Small Airplane Directorate,
 Aircraft Certification Service

10-23-08
 Date

ELOS Originated by: Boston ACO	ACO Manager: Robert G. Mann, Jr.	Routing Symbol: ANE-150
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cc: ANE-150 r/f / RN / JL / JC / GH / MD / ANE-172(MMuratore)

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