To: All LSA producers
Date: after AirVenture Oshkosh 2013
Subject: Weight exemption received by Icon Aircraft
Purpose: to advise producers regarding requests for exemption

NOTE that to assure accuracy the following communication was reviewed in advance by the LAMA board of directors, FAA's Small Aircraft Directorate, and selected other industry leaders.

At AirVenture Oshkosh 2013, Icon Aircraft held a press conference where the company advised it had been granted a weight exemption requested 14 months earlier. This allows Icon's A5 seaplane to weigh a maximum of 1,680 pounds (762 kg) contrasted with the 1,430 pounds (650 kg) to which Icon and all other LSA seaplane designers were previously limited by regulation.

The exemption is simply that, an exemption to the rules, not a change in the rules. Exemptions may be withdrawn or may be used as methods to evaluate future rule changes.

Icon advised in their press conference that they will be using 80 pounds (36 kg) of the 250 pounds (114 kg) additional allowed, targeting a gross weight of 1,510 pounds (686 kg).

ACCORDING TO FAA
At the LAMA board of directors meeting coincidentally held on the evening of Icon's press conference, Small Aircraft Directorate manager, Earl Lawrence asked for a time opportunity to advise LAMA board members more fully.

In his remarks Earl Lawrence noted that, "Weight was not a factor. [The agency's decision to grant the exemption] was solely based on Icon addressing the 70% of fatal accidents" caused by loss of control (usually stall/spin). He added, "Any company that addresses this may also be eligible for an exemption, but must meet all the exemption requirements, *and* still meet all current rules."

NOTE that other requirements are also added; see the actual exemption for more detail.

Mr. Lawrence continued, "Additional weight was a result of offering a provable SRA [Spin Resistant Airframe] design, while still maintaining all the other safety related features of the original aircraft and new additional design restrictions outlined in the exemption grant." After further explanations, he concluded, "All companies who can prove SRA by a production flight test may be eligible for an exemption and FAA would be pleased for SRA to become a standard feature of SLSA." His primary point was that since stall/spin accidents are the most common problem leading to fatalities, any design that resists stalls and spins — and can properly document such behavior to FAA's satisfaction — deserves consideration for an exemption. Icon must repeat their proof using a production model.

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Lawrence clarified two other points, but urged everyone to read the entire exemption to fully understand what the agency had granted and why. He noted that LSA qualifying for the exemption cannot use more than 100 kilowatts of power (approximately 134 horsepower). He also observed that “Sport Pilots may still fly [such exempted and higher weight LSA] and that someone holding a Light-Sport Repairman – Maintenance credential can still maintain these exempted LSA.

SHOULD YOUR COMPANY REQUEST AN EXEMPTION?
Any company should ask: Do I want added weight for my Light-Sport Aircraft? If you do not genuinely need the weight, then LAMA urges you to save your company the time and money.

However, if you do believe you want to apply for an exemption for more weight, here are some considerations:

(1) The process is lengthy and will require you to submit very detailed test results, for a production aircraft, along with documentation of the engineering changes. LAMA encourages all LSA producer companies to read the entire exemption and therefore, a PDF file is attached (U_S_DOT_FAA_-_Decision.pdf). FAA has a new website to help at http://aes.faa.gov/petition/home.html

In the attached PDF file, be sure to note the "Conditions and Limitations" on pages 16 & 17 to see the additional requirements Icon must meet. As FAA states, “This exemption terminates on June 30, 2018, unless sooner superseded or rescinded.”

NOTE that if you wish to ask for extra weight to cover the weight of, by example, having an airframe parachute, or inflatable seatbelts, or fire extinguishers, or any other safety feature ... LAMA recommends that you not take action. Lawrence made it very clear that such other safety features were already addressed in the original proposed rule, which increased weight over the original NPRM to specifically allow for these items.

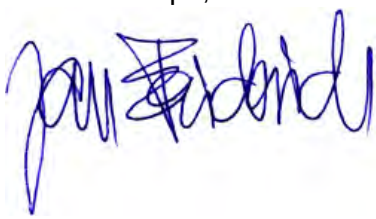
You should know that other companies such as Cirrus Design and then-Columbia Aircraft also tried to achieve SRA in the late 1990s and were unable to do so. Some earlier designs did achieve this but proving SRA conclusively is not simple and while it may be somewhat easier for a lighter, slower airframe, it is a significant achievement for any company to claim.

(2) If you believe you can achieve a SRA *and* if you can provide quality documentation of your achievement, your company may elect to go forward with an exemption request.

NOTE that it took Icon 14 months to get a response and it is likely that they used significant resources to gain their exemption. While it may not take as long for a second petition for essentially the same request, it will definitely take time and will use your funds and personnel time.

Respectfully submitted on behalf of the LAMA Boards of Directors for USA and Europe,

Dan Johnson, president and chairman



Jan Fridrich, Chairman of LAMA Europe

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