

Statement of Donald F. Kroesch

1. I submit this Statement in support of the letter from the Soaring Society of America of December 22, 2025 (the “SSA Comment Letter”). That letter provides comments on a proposed Piper PA-25 Airworthiness Directive identified as follows (the “Proposed AD”):

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2. I am a graduate of Lewis University, where I was awarded a degree in Aviation Maintenance Management. Since 1974 I have been a licensed Airframe and Powerplant Mechanic, No.2225104. I also hold pilot ratings in airplanes and gliders.

3. I regularly perform maintenance and repair work on airplanes and gliders, including the Piper Pawnee PA-25 that has been owned by the Chicago Glider since 1992. I have done so for 28 years. I also sometime serve as a tow pilot, flying the Piper Pawnee in glider tow operations at the Chicago Glider Club, which is located in Minooka, Illinois.

4. I have served as the President of the Chicago Glider Club and in other Board positions for a total of 28 years. Among other maintenance and repair work on the PA-25, in 2021 I was the individual principally involved in replacing the wing fabric on the Chicago Glider Club’s PA-25. I am very familiar with the structure of the Piper PA-25 Pawnee wing. In addition, in my professional career I served for 30 years as the Director of Engineering of a shop specializing in maintenance and repair of railroad cars and other equipment.

5. I took the photos of the Chicago Glider Club’s Piper Pawnee shown as Figures 4 and 5 of the SSA Comment Letter. They accurately reflect the condition of the wing of the Chicago Glider Club PA-25 at the time of recovering in 2021 (Figure 4) and in December 2025. (Figure 5).

6. I have reviewed the logbooks of the Chicago Glider Clubs PA-25 Pawnee. Its serial number is 25-4937, and the records show that it was built in 1969. As of December 2025, its logbooks reflect 6,400 hours of flight time, of which 3,640 were in agricultural use and 2,760 in glider towing.

7. I have read the SSA Comment Letter and concur in its comments concerning the difficulties and expenses that would result from implementing the Proposed AD.

8. The SSA Comment Letter correctly states that the reoccurring inspections stated in the Proposed AD would require removing and replacing 48 thread-forming screws every 100 hours or annually, whichever occurs last. This would be a repetitive, destructive inspection process likely to threaten spar integrity by stripping, cross-threading, creation of burrs, or other conditions that presents a substantial risk of eventually requiring replacement of currently compliant spars.

9. Removal of sheet metal screws that have been in place for five or six decades will be difficult and time consuming. It is likely that some will break, making further use of the hole impossible. Repeated removal and replacement of screws that can be removed is likely to result in damage to the spar holes. I base these conclusions on many years of working on airplanes and other equipment that incorporate fasteners that have not been removed in many years. I believe it to be a common understanding of individuals like myself, experienced in working on older aircraft.

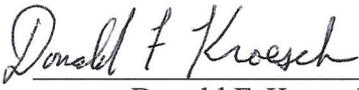
10. Not only are the removal of such screws likely to threaten spar integrity, the process is likely to be very time-consuming. In addition to removal of the screws, which is required to bend back the leading-edge metal sheet on the PA-25 wing to allow eddy current inspection of the wing spar, as called for by the Proposed AD, installation of inspection panels will require cutting out portions of the fabric to install the inspection panels.

11. I believe the hourly labor estimates contained in the SSA Comment letter are fair and reasonable. They are that the eddy current inspection will require the following: (a) installation of six new inspection panels on the wings of the Pawnee that are currently sold for \$1,600 by LAVIASA and Univar, the only two known sources of supply; (b) approximately ten hours per wing to remove the screws and make the required area available for eddy current inspection; and (c) approximately six hours per wing to close the wings following inspection.

12. I agree with the SSA Comment Letter that the use of a 3 mm borescope to inspect the front spar and its connection to the leading-edge sheet metal is a far better, less destructive method of inspection of Piper Pawnee wings than the eddy current inspection method proposed by the AD. The photographs taken by such a borescope and copied as Figures 7 and 8 in the SSA Comment Letter provide sufficient detail to detect cracks or other abnormalities in the Pawnee wing spar.

13. I have conducted a review of the National Transportation Safety Board's on-line records of accidents and incidents involving Piper Pawnee PA-25 aircraft for the period from 1975 to date. It contains no records of spar failures by Piper Pawnee PA-25 aircraft with Piper-manufactured wings. The only Pawnee wing spar failures in the NTSB data base, two in number, occurred on all-metal Hutcherson wings installed pursuant to STC SA 501SW. As modified, the wings were not the same as original Piper-built wings.

14. All of the conclusions in this Statement are true to the best of my knowledge and belief, based on my experience as described above.



Donald F. Kroesch

Dated: December 22, 2025