

DISCOVERY AVIATION

Discovery Aviation, Inc.
100 Aerospace Dr.
Unit 4
Melbourne, Florida 32901

11/20/2017

Dear Sir,

REF: ISNAPT PED.A00168

Discovery Aviation Inc., is a design and manufacture organization responsible for the FAA, IFR Certified XL-2 light training aircraft. Our establishment is located on the 'Space-Coast' in Florida USA. Our candidate aircraft the XL-2 is currently certified to meet Part 23 by the FAA in the USA, and is certified by EASA in Europe, the CAAC in China, the DGAC in Malaysia, and the DCGA in Indonesia, CASA in Australia and by the DGAC in Thailand.

To date we have sold 136 aircraft worldwide to both flight training organizations and to individual pilots. The aircraft are used aggressively in the commercial flight training environment as can be seen by our customer link: LIFT flight training academy <http://www.liftflightacademy.com/> .The aircraft is also operating with the USAF Kadena Air Force Base, Flight Training Center in Japan.

We are currently in the process of restarting manufacture of the aircraft after a period of focusing on custom composite aerospace parts for other aircraft manufactures. Discovery Aviation Inc., is very much interested in participating in the upcoming tender for the procurement of 12 ISNAPT aircraft.

In order to permit our participation in the ISNAPT program, we would like to propose that the following changes to the requirements of PED-A-00168 be considered:

1. Paragraph 4.2.9.3. The Maximum Take-Off Distance, under ISA conditions, apnea, sea level runway, with Maximum Take-Off Weight (MTOW), must be less than 2565 ft The Maximum Take-Off Distance is determined as the distance the aircraft has to travel from standing position until it has reached an altitude of 15 meters from the runway level.
2. Paragraph 4.2.9.5. The climb rate, under ISA conditions, apnea, at sea level altitude, with MTOW, must be more than 669 ft/min.
3. Paragraph 4.3.1. The airframe Life Limit of the A/C is set by specific individual life limits noted in the Airworthiness Limitations Section of the Maintenance Manual. Some minor part retirement lives can be less than 5,000 hours, however the parts must be removable and replaceable. The fuselage life must be 5,000 hours.

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From our experience as manufacturers of light training aircraft and our experience supplying these aircraft to commercial flight training operations, we would suggest for the benefit of the under-procurement system to add the following additional requirements:

1. The A/C must be certified to meet FAR 23 or EASA CS-23. This is the minimum level of certitude for training aircraft used in commercial flight schools. (graded criterion)
2. The A/C and its components must be certified by EASA or an equivalent certification aviation authority for flying under IFR Day/Night rules, to allow a broader operational capability (graded criterion)
3. The aircraft should be equipped with a FADEC system. The FADEC system manages Fuel/Air mixture, thereby improving the engine longevity, and simulating single throttle 'turbine' operations (graded criterion)
4. The aircraft should be able to be de-rigged and capable of being stored in a standard 20 ft shipping container.

We believe these suggestions will open the tender allowing improved capability of the aircraft for the benefit of the HAF program.

Sincerely,



C. J. Corman

cc: Jason Russell