

FAA Registration – Once Is Not Enough

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Have you sold your airplane recently? What did you do with your registration card? Have you completed your Triennial? What is a Triennial? Have you moved and forgotten to notify the FAA of your current address?

The FAA reports that the FAA Registry's Aircraft Registration Branch maintains records on approximately 340,000 aircraft, but that it lacks accurate information about aircraft owners. As a result, the FAA published an NPRM (Notice of Proposed Rulemaking) in February, 2008 proposing to amend requirements regarding aircraft registration. The comment period has expired, so be aware that new requirements may be issued soon.

Currently, a Triennial Aircraft Registration Report (Triennial) is due when three years have passed without certain aircraft registration activities having taken place. The FAA now proposes to eliminate the requirement for the Triennial. The proposed re-registration and renewal requirements would supersede and eliminate the need for the information obtained via the Triennial.

The FAA believes that limiting the duration of a Certificate of Registration (“Certificate”) would be the most effective method of increasing the accuracy of its records. It proposes that the expiration of all Certificates for currently registered aircraft and the imposition of re-registration requirements for those aircraft that remain eligible for registration. Under this proposal, aircraft owners desiring to maintain registration would have to re-register their aircraft within a specified time period. Re-registered aircraft would receive a Certificate with an expiration date, as would all new Certificates issued after the effective date of the rule. Thereafter, the Certificate would expire three years from the date of issuance, but would be renewable for successive three-year terms upon completion and submission of a renewal request form and payment of the applicable fee.

A registered aircraft owner would have to promptly file re-registration and renewal actions. Temporary operating authority (pink slip operations) under 14 CFR 47.31(b) would not be available when renewing because no transfer of ownership would occur. Upon completion of processing by FAA, the renewed Certificate with a new expiration date would be sent to the registered owner at the address indicated on the renewal form.

The effect of which owners must be wary is that the owner must renew its registration and receive the renewed Certificate before expiration. If an owner renews after the registration expires, the aircraft will no longer be properly registered with the FAA and thus not be operable. The N-number assigned to the aircraft would be administratively cancelled no earlier than 30 days following the end of the specific period of time given for re-registration.

Currently, a Certificate does not expire. FAR 47.41(b) requires the last registered owner to endorse the reverse of the Certificate and send it to the FAA Registry after the sale of

an aircraft or other event listed in FAR 47.41. The FAA believes that it is frequently not notified of changes affecting registration.

Current owners are not the only aircraft owners affected. The NPRM also addresses the length of pink slip operations for aircraft for which ownership has transferred. The FAA proposes that the maximum time that the pink copy of the Application, including any subsequently issued extensions, may be used as temporary operation authority after ownership has transferred, and registration requirements have not been met, is twelve months. If the owner has not registered the aircraft within the 12-month timeframe, the aircraft would not be eligible for operation.

Dillon L. Strohm is an attorney with the law firm of Jackson & Wade, L.L.C. and counsels clients on the acquisition, financing and operation of corporate jets operated under Part 91 and Part 135 of the Federal Aviation Regulations. Jackson & Wade, L.L.C. can be found at www.jetlaw.com.