



AVIATION WORKING GROUP

June 13, 2012

Kathryn Thomson
Chief Counsel
800 Independence Avenue, SW
Federal Aviation Administration
Washington, DC 20591

Re: Non-Citizen Trust / Proposed Policy Clarification for the Registration of Aircraft to U.S. Citizen Trustees in Situations Involving Non-U.S. Citizen Trustors

Dear Katie,

On behalf of the entire AWG and entities supporting our recent comments on the proposed policy clarification, docket No. FAA-2011-0012 (the **PPC**) regarding Non-Citizen Trusts (**NCT**), I would like to thank you and the entire FAA team for taking the time to travel to Oklahoma City and engage in a dialogue about these important issues during the June 6, 2012 public meeting.

As requested, attached is a copy of our presentation, which we understand will be made part of the public record.

As you know, the public meeting highlighted several complex and important issues and questions. We believe the agency and interested stakeholders (both those present and others not able to attend) would benefit by allowing additional time to carefully review the transcript of the meeting, formulate questions/answers, coordinate positions, and provide supplemental comments. Accordingly, we request that the comment period be extended until September 15.

Finally, we continue to believe that the agency and parties would benefit from an informal meeting between you and your staff and the relevant program office, and a few members of our Industry Group's steering group prior to final agency action on the PPC. We fully support the FAA's desire to ensure a transparent process. We believe that nothing in the APA or Department's *ex parte* rules would prohibit or discourage such a meeting about a proposed policy statement. We support having detailed meeting notes promptly placed in the public docket.

We thank you very much for taking our views into account.

Sincerely yours,

Jeffrey Wool
Secretary General
Aviation Working Group

CC: M. Gilligan, M. Warren, J. Standell, FAA
CC: Each of the Supporting Entities Referenced in the May 23, 2012 Letter
CC: S Scherer (Boeing) and C. Brandes (Airbus), AWG Co-Chairs
CC: J. Pritchard (Holland & Knight), A. Brantner (GECAS), and K. Quinn (Pillsbury), Industry Group Representatives