

Notice of Proposed Policy Clarification for the Registration of Aircraft to U.S. Citizen Trustees in Situations Involving Non-U.S. Citizen Trustors and Beneficiaries [Docket No. FAA-2011-0012]
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to:

LaDeana Peden

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Flexjet, a fractional ownership program manager, holding Management Specifications under Part 91 Subpart K (91.1015), submits the following comments regarding the proposed FAA policy:

FLEXJET COMMENTS: Because FAA concerns are either non-existent or substantially mitigated, the registration of fractional ownership program aircraft to U.S. citizen trustees in situations involving non-U.S. citizens and beneficiaries should be exempted from the proposed FAA policy for the following reasons:

1. Under 91.1003.(c) fractional program managers are designated as the owner's agent to receive service of notices that the FAA seeks to provide owner's hence, eliminating the FAA's safety oversight concerns expressed in the proposed policy.
2. The fractional program manager is jointly liable with the owner for compliance; 91.10119(a).
3. All information and records including, but not limited to, owners, aircraft, maintenance, and pilots are located at the fractional program manager's principal base of operations or another location approved by the FAA and not in another "State", eliminating FAA concerns of "accessing information necessary to the execution of its State of Registry responsibilities"; 91.10015, 91.1027.

Respectfully submitted by,

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