

July 6, 1989

Airline Solutions, Inc.  
Attn: Richard A. Asper  
P.O. Box 70203  
Fort Lauderdale, FL 33307

Dear Mr. Asper:

This is in reference to the application, bill of sale, and Voting Trust Agreement received April 27, 1989, concerning Piper PA-34-220T, serial number 34-8233113, registration N31687.

We are of the opinion that the aircraft is not eligible for registration under the Voting Trust Agreement. Section 47.8(a)(2)(i) of the Federal Aviation Regulations (FAR) requires that the voting trustee be a U.S. citizen; the Agreement states that the trustee is a permanent resident and therefore does not meet this requirement.

Section 47.8(a)(2)(iv) of the FAR requires that there be no reason, situation, or relationship under which any other party to the Agreement might influence the exercise of the voting trustee's totally independent judgment under the Voting Trust Agreement. We are concerned that since the trustee is the wife of the president of the company, she may not be truly independent in the exercise of her trustee functions. There appears to be a prohibited relationship.

Accordingly, we have recommended to the Registry that they deny the registration of the aircraft. The aircraft may be registered to an eligible applicant upon receipt of a transfer of ownership document, the new owners' application for registration, and registration fee, or upon receipt of a restructured Voting Trust Agreement.

If you have any questions regarding these documents, you may contact the undersigned at (405) 680-3296.

Sincerely,

Joseph R. Standell  
Assistant Chief Counsel  
for the Aeronautical Center

(8) RB  
By: R. Bruce Carter  
Attorney Adviser

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