



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Mike Monroney  
Aeronautical Center

P.O. Box 25082  
Oklahoma City, Oklahoma 73125

April 24, 1997

Dean Torgerson, Paralegal  
Aircraft Owners and Pilots Association  
421 Aviation Way  
Frederick, MD 21701-4798

Dear Mr. Torgerson:

Thank you for your inquiry regarding transfer of interests in aircraft represented by value rather than fractions of ownership. The situation you recounted involves an aircraft co-owned in equal shares by a mother and son. The mother desires to annually transfer a portion of her interest valued at \$10,000 as a gift to her son. This gifting will continue until the son owns full interest in the aircraft. It is my understanding that each portion transferred will be represented by a dollar figure rather than a fraction, decimal, or percentage, e.g. a \$10,000 interest in the aircraft versus a 1/5 interest in the aircraft.

After consultation with management of the Civil Aviation Registry, it appears the Registry is not equipped to handle transfers of interest represented by specific dollar amounts. However, we have seen conveyances of fractional interests bearing language similar to the following: The interest conveyed herein is a gift, the value of which does not exceed \$10,000. Although we have seen these type of conveyances recorded at the Registry, we do not offer our legal opinion as to the sufficiency of such transfers for purposes of estate and taxation laws.

As a collateral question, you asked whether, upon the filing of each subsequent transfer of a partial interest, re-registration of the aircraft will be required. It is our opinion that until the actual ownership changes, not the proportions thereof, re-application for aircraft registration will not be required.

If you have questions or comments, you may contact the undersigned at (405) 954-3296.

Sincerely,

Joseph R. Standell,  
Assistant Chief Counsel

By:

Michael R. Burton