



U.S. Department
of Transportation
**Federal Aviation
Administration**

Mike Monroney
Aeronautical Center

P.O. Box 25082
Oklahoma City, Oklahoma 73125

June 25, 1999

Mr. Warren F. Chmura
Southern Aircraft Consultancy Inc.
Meadowside Cot Valley
St. Just, Cornwall TR19 7NS

Dear Mr. Chmura:

This responds to your letter dated June 8, 1999. In your letter you indicated that you intend to purchase an aircraft which is currently registered to Hiller Inc., Trustee. According to you, the trustee, a Delaware corporation, has been dissolved.

Your question is whether a Bill of Sale from a person you describe as the beneficial owner, will be acceptable to the FAA as evidence of ownership in an applicant for registration.

The initial answer is no. Since the aircraft is currently registered in the United States, the provisions of Section 47.35 of the Federal Aviation Regulations applies (14 C.F.R. 47.35). Generally, the evidence of ownership must be either a bill of sale signed by the last registered owner, in this case, the trustee, to the applicant or a series of mesne conveyances from the last registered owner to the applicant.

Subsection (b) of Section 47.35 does provide some relief from the more stringent requirement for specific bills of sale or equivalent conveyances by providing for submission of "other evidence that is satisfactory to the Administrator."

I decline to advise you on what "other evidence" will be acceptable. Therefore, I recommend that you first consult an attorney to determine what evidence of ownership is available to you and then consult with management of the Civil Aviation Registry to determine what evidence will be considered satisfactory to the Administrator.

You may contact the Civil Aviation Registry at (405) 954-3116.

Sincerely,

Joseph R. Standell,
Aeronautical Center Counsel

By:


Michael R. Burton
General Attorney