



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

Mike Monroney
Aeronautical Center

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December 8, 1999

William L. Teague, Esq.
Crowe & Dunlevy
1800 Mid-America Tower
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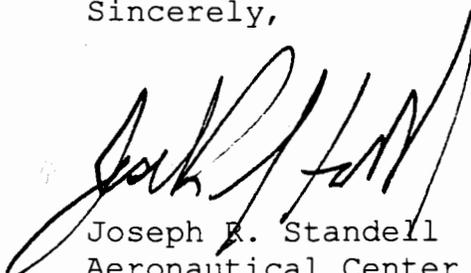
Dear Mr. Teague:

Auxiliary Power Units ("APUs")

This responds to your letter of December 8, 1999, in which you request our opinion as to whether security agreements, which identify auxiliary power units ("APUs") which are not capable of powering 750 rated takeoff power engines are recordable. You telephonically represent that the situations referenced in 49 U.S. 44107(a)(2)(C) and (D) are not applicable to the APUs.

As we discussed, the only possible basis for recording would be as it relates to "a specifically identifiable aircraft engine having at least 750 rated takeoff horsepower or its equivalent." 49 U.S.C. 44107(a)(2)(A). Since your letter stipulates that the APUs (even if they were to be considered engines by reason of their association with the powering of engines) do not meet the 750 rated takeoff power threshold, I conclude that 49 U.S.C. 44107(a)(2)(A) is inapplicable and the APUs are not recordable with FAA.

Sincerely,



Joseph R. Standell
Aeronautical Center Counsel

cc:
AFS-751