

November 16, 1982

Mr. Preston G. Gaddis II  
Attorney at Law  
Crowe & Dunlevy  
1800 Mid-America Tower  
20 North Broadway  
Oklahoma City, Oklahoma 73102

Re: Commencement of Initial 6-Month Reporting  
Period for Noncitizen Corporations

Dear Mr. Gaddis:

You have asked for an interpretation of Section 47.9 of the Federal Aviation Regulations (14 CFR 47.9) as to the time from which the initial 6-month reporting period is calculated. Paragraph 47.9(b)(2) refers to "the period consisting in the remainder of the registration month and the succeeding 6 calendar months and each 6-month period thereafter." This is intended to mean the month in which the Certificate of Aircraft Registration is issued, without regard to the date the Application for Aircraft Registration was filed with the Aircraft Registry. We recognize that the time between the date of Application and the date the Certificate is issued may be thereby essentially unreported, but the flying time report is required beginning only with that month in which the Certificate of Aircraft Registration is actually issued.

Sincerely,

Original Signed By  
R. BRUCE CARTER

R. Bruce Carter  
Acting Aeronautical  
Center Counsel

bcc:  
AAC-250 ✓  
AGC-7  
AGC-200