

JUN 2 1966

GC-25

Dear Mr. Green:

This is in reply to your letter of June 2, 1966, requesting an interpretation of § 47.31 of the Federal Aviation Regulations on the following question: When does the second duplicate copy (pink) of the Application for Aircraft Registration (FAA Form 8030-1) become effective as temporary authority to operate the aircraft? You state that our changing of the words "by sending" to "must submit" in revised § 47.31(a) has resulted in several finance companies being advised that the pink copy of the Application is no longer effective during the period between ~~the~~ dispatch and receipt by the FAA. This Office interprets the term "submit", in § 47.31(a), as meaning mailed or delivered to the FAA Aircraft Registry. Therefore, an applicant has complied with § 47.31(a), and the pink copy of the Application for Aircraft Registration is effective as a temporary authority to operate, when the material listed in § 47.31(a) is deposited in the mail or delivered to the FAA Aircraft Registry. As stated in the preamble to revised Part 47 (see 31 F.R. 4495, March 17, 1966), the change of "by sending" to "must submit" was not intended to result in any substantive change.

Sincerely yours,

15/
James B. Minor
Associate General Counsel
Regulations and Codification Division

Mr. Stanley J. Green
Executive Secretary
Aerospace Industries Association
of America, Inc.
1725 De Sales Street, N.W.
Washington, D. C. 20036

AEROSPACE INDUSTRIES ASSOCIATION OF AMERICA, INC.

1725 DE SALES STREET, N.W., WASHINGTON, D. C., 20036 TEL 347-2315

2 June 1966
File: 11.1.47

Mr. James B. Minor, Chief (GC-20)
Office of the General Counsel
Regulations Division
Federal Aviation Agency
800 Independence Avenue S. W.
Washington, D. C. 20553

Dear Mr. Minor:

The Aerospace Industries Association respectfully requests an interpretation of FAR 47.31, revised 1 May 1966, regarding the validity of the temporary (pink copy) aircraft registration certificate prior to the actual receipt of the original registration certificate by the FAA Aircraft Registry.

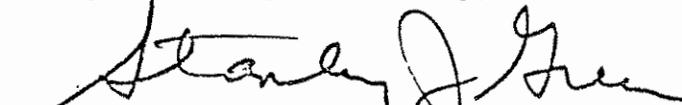
An interpretation is necessary as certain aircraft finance companies have been advised that the temporary registration certificate is not effective until the original has actually been received by the FAA Registry. It is our understanding, however, that no substantive change was made in this revision and further, that the words "must submit" have a broader connotation than the former words "... made by sending." As construed by these finance companies, the regulation would prohibit the transfer and delivery of aircraft on weekends.

Mr. Lester Robinson of the FAA Aircraft Registry staff has advised us that no change in the former procedure was intended. However, the attorneys for these finance companies have insisted that before they will rely upon Mr. Robinson's interpretation, it must be substantiated by the FAA's Office of the General Counsel.

Because of the importance of this matter we would appreciate an interpretation as soon as possible and respectfully request that a copy of this interpretation be made available to Mr. Robinson.

Very truly yours,

AEROSPACE TECHNICAL COUNCIL


Stanley J. Green, Executive Secretary
Airworthiness Requirements Division