

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

10 May 1971

AERONAUTICAL CENTER
P. O. BOX 25082
OKLAHOMA CITY, OKLAHOMA 73125



Mr. Sidney W. Steele
P. O. Box 5285
Irving, Texas 75060

Re: Interpretation of Part 123 of the Federal Aviation Regulations

Dear Mr. Steele:

This is in reply to your inquiry of 5 May 1971. Interpretations of Part 123 of the Federal Aviation Regulations are matters within the jurisdiction of the appropriate FAA Regional Office and not the Aeronautical Center. Accordingly, your inquiry as to exactly how many people could be part owners of an aircraft before the group would be considered an air travel club is a question to be answered by the Southwest Regional Counsel. It should be noted that it is still the Aeronautical Center's position that an aircraft may not be registered under circumstances which indicate that the transaction is an attempt to avoid the requirements of Part 123 of the Regulations. Therefore, we would decline to register the Lodestar if such a determination is made by the Regional Counsel's Office in Fort Worth.

We are sending a copy of your letter and our reply to the Southwest Regional Counsel's Office for their information, and suggest you contact them directly on this matter.

Sincerely,

ORIGINAL SIGNED BY
FREDERICK C. WOODRUFF

FREDERICK C. WOODRUFF
Asst. Aeronautical Center Counsel, AC-7

cc:
SW-7
AC-250 ✓