



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

Mike Monroney
Aeronautical Center

P.O. Box 25082
Oklahoma City, Oklahoma 73125

September 1, 2004

Preston G. Gaddis II, Esq.
Crowe & Dunlevy
1800 Mid-America Tower
20 North Broadway
Oklahoma City, OK 73102

Dear Mr. Gaddis:

Aircraft model changes

This responds to your letter of August 25, 2004, in which you stated that you have several clients who have modified their aircraft in such a way that the aircraft model changes from that shown on the Aircraft Registration Certificate. Those clients have filed the airworthiness information showing the resulting model and an AC Form 8050-1 Aircraft Registration Application indicating the resulting aircraft model after the changes. Paraphrasing, you asked whether the modifications resulting in a model change cause the Certificate of Aircraft Registration to become ineffective.

As you correctly pointed out, Section 47.41 of the Federal Aviation Regulations (14 CFR Part 47) specifically identifies those events that cause an Aircraft Registration Certificate to become ineffective. Currently Section 47.41 does not include model changes as a basis for causing the Aircraft Registration Certificate to become ineffective.

It is possible that a court of competent jurisdiction may determine that a model change does cause an Aircraft Registration Certificate to become ineffective for other purposes, however, we do not offer an opinion on that possibility.

If you have questions or comments, you may contact the undersigned at (405) 954-3296.

Sincerely,
Joseph R. Standell
Aeronautical Center Counsel

By:

Michael R. Burton
Senior Attorney