



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

Mike Monroney  
Aeronautical Center

P.O. Box 25082  
Oklahoma City, Oklahoma 73125

March 1, 2007

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

Dear Mr. Gaddis:

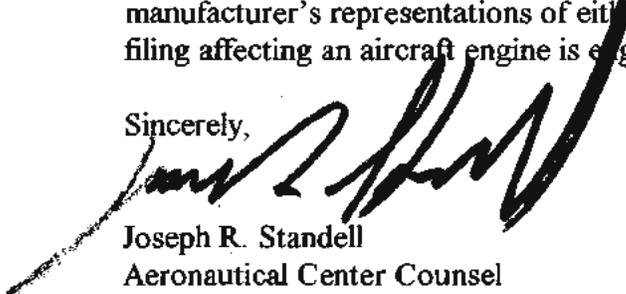
**Engine Horsepower and Thrust Measurements  
Under 49 U.S.C. Section 44107(a)(2)(A)**

This responds to your letter of December 27, 2006, in which you requested the Federal Aviation Administration's opinion as to the number of pounds of thrust a jet propulsion aircraft engine must have to be equivalent to 550 rated takeoff horsepower. We don't have the answer and are informed that there is no reliable scientific formula to determine equivalency.

Section 44107(a)(2)(A) was amended to change 750 horsepower to 550 horsepower to make it consistent with the Cape Town Protocol. However, neither the original statute nor the amendment addresses thrust, a very different measure of power. Nevertheless, FAA's Aircraft Registry currently accepts filings representing that the engine(s) has at least 550 horsepower or at least 1750 pounds of thrust.

As we recently discussed via telephone, the Aircraft Registry will continue to rely upon engine manufacturer's representations of either horsepower or pounds of thrust in determining whether a filing affecting an aircraft engine is eligible for recording.

Sincerely,



Joseph R. Standell  
Aeronautical Center Counsel

Cc: Scott Wilson