



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

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January 29, 2013

Jack P. Gilchrist, Esq.  
DeBee Gilchrist  
100 North Broadway Ave.  
Suite 1500  
Oklahoma City, OK 73102-8609

Dear Mr. Gilchrist:

**Re: Request for FAA counsel Opinion regarding operations on a  
photocopy of the Certificate of Registration (FAA AC Form 8050-3)  
(Your File Number: 5003.0423)**

Thank you for your thought provoking letter of November 19, 2012, in which you request that a registered owner also be allowed to carry aboard an aircraft a photocopy of the certificate of registration in the event the original is lost or damaged, and to utilize it for only that time between request and receipt of a duplicate copy.

You acknowledge that Article 29 of the Chicago Convention mandates that an aircraft engaged in international navigation carry its certificate of registration, but you point out that aircraft (operating within the United States) may operate on the "pink copy."

As you are aware, the pink copy is not a photocopy of a certificate of registration. It is part of an FAA generated Aircraft Registration Application package (AC Form 8050-1) and is pink so as to be readily identifiable aboard an aircraft as temporary authority to operate in the United States without registration pending completion of the application process.

Authority for use of the pink copy is set out in 49 USC § 44101(b)(3). Moreover 14 CFR § 47.31(c) provides that "*after compliance with paragraph (a) of this section, the applicant for registration of an aircraft last previously registered in the United States must carry the second copy of the Aircraft Registration Application.*" [emphasis supplied]

In any event, Article 29 of the Chicago Convention as augmented by Section 7.2 of Annex 7 to the Convention on International Civil Aviation ("The certificate of registration shall be carried in the aircraft at all times.") militates against your proposal. In that regard, while the original certificate is aboard the aircraft, the photocopy is not being utilized. If the original is lost or destroyed, the photocopy may not be utilized for operation of the aircraft.

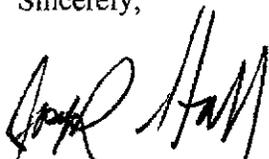
The fact that there is a warning on airworthiness certificates regarding reproduction being a punishable offense, does not appear to help your argument.

Although I can see where on occasion, having a photocopy aboard an aircraft might prove handy; it likely would not outweigh the possible confusion or mischief that might result by having aboard a photo duplicate of the original certificate.

If you would like to pursue this further through petition for rulemaking, please see 14 CFR § 11.61 through 14 CFR § 11.73.

I am sorry this response is not favorable.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph R. Standell". The signature is stylized and cursive, with a large initial "J" and "S".

Joseph R. Standell  
Aeronautical Center Counsel

*duplicate  
Certificate*

*Teaching matter*

*A 29.  
Annex*



November 19, 2012

*ASSIGN TO  
IRS  
19 Nov 12*

Joseph R. Standell, Esquire  
Aeronautical Center Counsel  
Federal Aviation Administration  
P.O. Box 25082  
Oklahoma City, Oklahoma 73125

Re: Request for FAA Counsel Opinion regarding operations on a photocopy of the Certificate of Registration (FAA AC Form 8050-3)  
Our File Number: 5003.0423

Dear Mr. Standell:

Please accept this letter as a request for an opinion from your office in connection with domestic operation of an aircraft, properly and lawfully registered on the FAA, Civil Aviation Registry, utilizing a photocopy of the aircraft's Certificate of Registration ("COR").

Our request is limited to only aircraft which have been and continue to be, duly registered with the FAA under the requirements of Title 49, United States Code, Transportation, and the Federal Aviation Regulations promulgated thereunder, but for which the original hard copy certificate issued by the FAA has been misplaced, allowing continued operation of the aircraft by the Registered Owner.

Despite precautions being taken, inevitably during normal operation and maintenance of an aircraft, there are instances where the COR is misplaced or damaged. Our client is concerned with how to continue normal operation of the aircraft when such instances occur.

We are aware of the procedures necessary to request a duplicate COR. However, delay between requesting a duplicate COR and its issuance can create an economic hardship on the Registered Owner, particularly if the aircraft is being used in commercial operations. To avoid such hardships, we are specifically requesting your opinion whether the Registered Owner may photocopy the COR and place the photocopy in the aircraft, for use in the event of the original COR being lost or damaged. The copied COR would remain in the aircraft and would be utilized for only that time between requesting and receipt of the duplicate COR.

*Mixed up  
Dupl  
and  
original*

We accept that Article 29 of the Chicago Convention on International Civil Aviation enumerates certain documentation that must be carried onboard an aircraft. This includes carrying onboard "its certificate of registration." However, if a yet to be registered aircraft can lawfully operate (pink copy), why should a registered aircraft's operation be limited, if proof of registration (a photocopy) can be shown? Further, it is clearly stated on an aircraft's Airworthiness Certificate, that reproduction of the certificate is punishable by fine or imprisonment. There is no such prohibition on the COR. Our request would allow continued normal operation by permitting a photocopy to serve as the COR "Hard Card,"

*Language*

Joseph R. Standell, Esquire

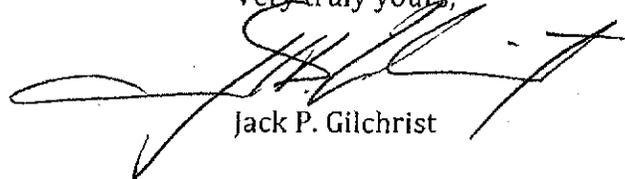
November 19, 2012

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while a replacement is being obtained. Nothing in our request is adverse to FAA procedures already in place, and would be beneficial to the civil aviation public.

We appreciate your consideration of our request. If you have any questions concerning the above, please telephone the undersigned at 405-232-7777.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. P. Gilchrist', written over a horizontal line.

Jack P. Gilchrist