



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

Mike Monroney
Aeronautical Center

P.O. Box 25082
Oklahoma City, Oklahoma 73125

August 30, 1994

BY FACSIMILE AND REGULAR MAIL

Sharon Hoaglin
Aero Records & Title Co.
PO Box 19246
Oklahoma City, OK 73144

Lucien White, Esq.
Haight, Gardner, Poor & Havens
195 Broadway
New York, NY 10007

Dear Ms. Hoaglin and Mr. White:

CIVIL AIRCRAFT N418SP

As requested in Ms. Hoaglin's letter of August 24, we have reviewed a proposed Addendum to the Lease Agreement ("the Addendum") between CIT Group/Capital Transportation, Inc., ("CIT") as registered owner and Gulfstream Aerospace Corporation ("GAC") as lessee. The Addendum relates to a Lease Agreement originally entered into by C.I.T. Leasing Corporation ("CLC") as lessor, which CLC assigned to CIT.

The present, recorded Lease Agreement covers the aircraft and engines for civil aircraft N418SP, aircraft serial number 1218, a Gulfstream Aerospace G-IV-SP.

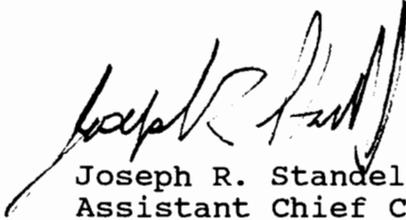
The Addendum would have two significant effects;

- 1) Termination of the Lease as to N418SP and,
- 2) Agreement to substitute a new G-14-SP aircraft upon future execution of a Lease Supplement describing the new equipment.

I do not believe the Addendum in its proposed form is a recordable document. The Civil Aviation Registry, of course, would record a stand-alone lease termination. However, a Lease Agreement for an aircraft no longer subject to the terms of the Lease Agreement, cannot independently support the recordability of an agreement to lease a new aircraft at some future time. Such agreement does not affect an interest in the new aircraft, and therefore, is not a recordable "conveyance."

Moreover, it would be inappropriate to use the aircraft record for N418SP to capture information totally irrelevant to it.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph R. Standell". The signature is written in a cursive style with a large, sweeping initial "J".

Joseph R. Standell
Assistant Chief Counsel
Aeronautical Center