



U.S. Department
of Transportation

**Federal Aviation
Administration**

Mike Monroney
Aeronautical Center

P.O. Box 25082
Oklahoma City, Oklahoma 73125

February 23, 1993

Mr. Lewis Hudspeth
Executive Vice President
Sierra Academy of Aeronautics
Oakland International Airport, CA 94614

Dear Mr. Hudspeth:

Aircraft Registration Applications
involving Korean Air Lines, Inc.

Incident to our telephone conversation of February 23, 1993, this will confirm the following:

An applicant for aircraft registration under Section 47.9 of the Federal Aviation Regulations (14 CFR 47.9) need not be a "citizen of the United States" as defined in 49 App U.S.C. 1301(16). The purpose of Section 47.9 is to enable corporations which are not U.S. citizens to register aircraft in the United States if the aircraft will be based and primarily used in the United States.

As you know, as applicable to the KAL aircraft, the corporate applicant must be incorporated in one of the fifty states, and must be the owner of the aircraft.

Sincerely,

Joseph R. Standell
Assistant Chief Counsel
Aeronautical Center