August 7, 1990 Mr. Leonard A. Ceruzzi Associate General Counsel Continental Airlines Post Office Box 4607 Houston, Texas 77210-4607

Dear Mr. Ceruzzi:

This is in response to your letter of March 20, 1989, requesting an interpretation of § 91.27(b) of the Federal Aviation Regulations (FAR). We apologize for the delay in responding to your inquiry, and thank you for your patience.

In your letter, you ask if it is permissible to mount the airworthiness certificate on the side of the cockpit door facing into the cockpit so that only the flight crew can see it when the door is closed.

The answer to your question is yes. Section 91.27(b) provides as follows:

No person may operate a civil aircraft unless the airworthiness certificate required by paragraph (a) of this section [§ 91.27] or a special flight authorization issued under § 91.28 is displayed at the cabin or cockpit entrance so that it is legible to passengers or crew. (Emphasis added.)

Since § 91.27(b) is framed in the alternative, compliance can indeed be achieved by hanging the airworthiness certificate on the side of the cockpit door facing into the cockpit so that only the flight crew can see the certificate when the door is closed. The regulation does not require the certificate to be legible to both the passengers and the crew. Instead, it requires that the certificate be legible to either the passengers or the crew.

This interpretation has been coordinated with two other organizations within the Federal Aviation Administration: the Air Transportation Division of the Flight Standards Service, and

Aircraft Manufacturing Division of the Aircraft Certification Service.

Thank you for your concern for compliance with the FAR. We hope that we have satisfactorily answered your inquiry.

Sincerely,

Donald P. Byrne Acting Assistant Chief Counsel Regulations and Enforcement Division