

FAA ISSUES NEW AIRCRAFT RE-REGISTRATION AND RENEWAL OF AIRCRAFT REGISTRATION RULES

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What's at Issue

The Federal Aviation Administration (FAA) has published new regulations that dramatically alter the aircraft registration process and establish new requirements to ensure registration records are kept current.

Why it's Important

All aircraft owners are impacted by this rule. All existing registrations will expire and owners are required to re-register their aircraft in an effort spread over the next three years (*see table below*). Thereafter, all registrations must be renewed every three years, or the registration will expire.

Registrations for all aircraft that are not re-registered by December 31, 2013, and their applicable N-numbers, will be cancelled by the FAA.

The purpose of the new rule is to ensure that the FAA aircraft database contains more accurate, up-to-date information on aircraft registration. The FAA believes that the primary benefit of this rulemaking will be the increased accuracy of the records within the Aircraft Registry.

Major Provisions

This rule adopts an expiration and re-registration process for all registered aircraft over a three-year period, followed by the required renewal of aircraft registration at three-year intervals.

For the re-registration process, the FAA expects filing within a two-month window prior to the scheduled expiration date to allow for processing the applications and mailing the new certificates. Applications submitted after the filing window closes will still be processed but the aircraft may be without authorization, and therefore unable to fly legally, until the registration administrative process has been completed and the registration has been mailed out and received.

According to the regulations, once an aircraft has completed re-registration and is approaching the required renewal, the owner may submit the required renewal information beginning six months prior to the current expiration.

Importantly, there is no way to ensure receipt of a new registration certificate prior to the expiration of the current certificate unless the required information is submitted at least two months before the current certificate expires.

OVER...

(Major Provisions Continued)

Key elements of the new rules are:

- The registration of all aircraft registered before October 1, 2010 will expire and must be re-registered.
- All aircraft owners are mandated to re-register their aircraft over a three year period, according to the table below, and then renew these registrations every three years thereafter.
- The FAA will mail two reminder postcards regarding the need to complete the re-registration/renewal process, as long as there is a valid mailing address in the current records.
- Owners should submit their re-registration no later than two months prior to the expiration of the current certificate. Re-registrations may be submitted in the five-month period preceding expiration. This effectively provides owners a three-month window to file for re-registration in order to ensure a timely return of the registration certificate in the mail.
- The expiration date printed on the registration certificate of aircraft registered or re-registered after October 1, 2010, the date the new regulations are effective, will be three years from the last day of the month in which registration occurred as provided in the table below.
- A renewed aircraft registration will expire three years from the previous expiration date in accordance with the table below. When renewing, registration information may be submitted in the six-month period preceding expiration. It should still be submitted no later than two months prior to the expiration date.
- Replacement registration certificates issued on or after October 1, 2010, will display the same expiration date that was shown on the registration certificate being replaced. If the replaced registration certificate did not display an expiration date, the replacement certificate will display the expiration date indicated in the table below. A replacement certificate does not constitute a re-registration or renewal.
- A \$5 re-registration fee will be assessed on top of the existing initial \$5 registration fee.
- The FAA is permitting those registrations that do not include a change to any information to be completed online. If there is a change to any information, the appropriate form must be mailed to the FAA.

The table below provides the registration expiration dates and the dates when re-registration should occur.

<i>If the Certificate was issued in:</i>	<i>The certificate expires on:</i>	<i>The owner must apply for re-registration between these dates, - to allow delivery of the new certificate before expiration.</i>
March of any year	March 31, 2011	November 1, 2010 and January 31, 2011
April of any year	June 30, 2011	February 1, 2011 and April 30, 2011
May of any year	September 30, 2011	May 1, 2011 and July 31, 2011
June of any year	December 31, 2011	August 1, 2011 and October 31, 2011
July of any year	March 31, 2012	November 1 2011 and January 31, 2012
August of any year	June 30, 2012	February 1, 2012 and April 30, 2012
September of any year	September 30, 2012	May 1, 2012 and July 31, 2012
October of any year	December 31, 2012	August 1, 2012 and October 31, 2012
November of any year	March 31 2013	November 1 2012 and January 31, 2013
December of any year	June 30, 2013	February 1, 2013 and April 30, 2013
January of any year	September 30, 2013	May 1, 2013 and July 31, 2013
February of any year	December 31, 2013	August 1, 2013 and October 31, 2013

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NATA Position

NATA recognizes the great benefit to having current information in the Aircraft Registry database but is disappointed with the overall implementation of the rule. Under the requirements of the amended rule, the owner is expected to apply for re-registration no less than two months ahead of the expiration of the current registration. NATA questions the processing time required and is concerned about possible lapses of registration in case an applicant falls just outside of this window. The ability to obtain issuance of a temporary registration in such a case would have been ideal, but is not offered.

From an operator perspective, we are particularly concerned about the increased attention required to those who operate aircraft owned by another party. The FAA addressed this concern in its response to submitted comments by arguing that most shared owner and operations will benefit from the new system as it allows for better tracking of current aircraft status via an online system.

NATA is also concerned about the increased possibility that registration and administrative fees may increase overtime, contingent upon passage of the latest version of the FAA reauthorization bill. Should that legislation pass, the FAA will be required to increase fees to \$130 for initial registration and \$45 for renewals.

NATA is disappointed that the FAA has not updated its electronic filing system for registration to accept both unchanged registrations and those with updates. Further, NATA will continue to press the FAA to allow for the online system to produce a confirmation that the information has been submitted and then to allow that confirmation to be carried with the expiring certificate until the new one arrives, allowing uninterrupted operation even if the new certificate is not received until after the expiration date.

Status

The rule (Docket No, FAA-2008-0188) is final. Aircraft owners are expected to comply starting October 2010. [Download a copy of the final rule.](#)

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