



## FAA Registry Continues to Improve and Streamline Filing Procedures

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We have been tracking the status of the FAA Registry in Oklahoma City as the FAA continues to revise procedures in order to maintain the health and safety of their employees while also providing efficient service to Registry users.

The Registry is still accepting documents for filing via both email and hard-copy submission.

When filing via email, all documents must be DocuSigned, and there is a 20-page “per document” limit (though this page limit has been waived for priority filings, such as a Declaration of International Operations, an Import, or an Export). The Registry has confirmed that the email submission time is *not* equal to the actual filing time – the FAA typically provides a filing time for electronically-submitted documents within 2 hours of submission. Thus, parties filing documents electronically will have 2 relevant times to consider – the email submission time, and the actual filing time. Depending upon the agreement of the parties, both times may be used as benchmarks in the transaction; parties should be cautious in using the email submission time as an actual closing benchmark, however, because, as stated, the email submission time is not equal to the filing time that, prior to the COVID-19 outbreak, parties typically received in real time during a closing.

Hard-copy documents (either ink-signed or DocuSigned) can be sent by mail or submitted to and picked up from a bin located outside of the Public Documents room at the FAA Registry. Note that, as stated, any documents longer than 20 pages that are not priority filings cannot be filed electronically, and so these documents must be bin filed even if they are DocuSigned. Priority documents are picked up from the bin at least every hour, and non-priority filings are typically picked up at that same time; workload permitting, the FAA is retrieving both priority and non-priority documents from the bin even more frequently than once per hour. Therefore, there is no longer a significant delay in the filing of bin documents versus electronic documents; in both cases, it is taking approximately 2 hours to obtain file-stamped copies of non-priority documents.

We will continue to monitor the status of the FAA Registry in Oklahoma City and provide updates as they are available.



Jessica L. Pownell focuses her practice in the areas of acquisition, sale, leasing, and registration of corporate aircraft and related regulatory matters. For more information please visit [www.coolinglaw.com](http://www.coolinglaw.com)

