



New Requirements under NBAA Small Aircraft Exemption

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The FAA has extended until March 31, 2022, the NBAA Small Aircraft exemption that permits operators of small aircraft (12,500 pounds or less) to conduct FAR Part 91.501(b) operations (e.g., timesharing agreements, joint ownership arrangements, and parent-subsidary operations.)

However, for the first time, the extension includes a requirement that operators of small aircraft file a "Notice of Joinder to FAA Exemptions No. 7897K," which must be submitted to the FAA electronically via <http://www.regulations.gov> and must include the following:

1. The person's name and, for a person other than an individual, the name of the authorized representative submitting the Notice of Joinder.
2. The person's physical address and, for a person other than an individual, the physical address for the authorized representative. If the person or the authorized representative does not receive mail at the physical address provided, a mailing address must also be provided.
3. The person's email address or, for applicants other than individuals, the email address of the authorized representative.
4. The person's telephone number(s).
5. The person's NBAA membership number.
6. A statement requesting the FAA appends the Notice of Joinder to the list of NBAA members authorized to exercise the privileges of Exemption No. 7897K.
7. An attestation that the person will not conduct any operation under Exemption No. 7897K if the person ceases to be a member of NBAA.
8. An attestation that the person will comply with all conditions and limitations of Exemption No. 7897K.

Current operators of small aircraft using the NBAA exemption should submit this notice by September 27, 2020.

The NBAA has promised a form to allow members to submit this notification. Follow this space for an update once that form has been released.



Lisa D. Holt has over 20 years of experience in federal taxation, leasing and financing of corporate aircraft, business and tax planning. For more information please visit www.coolinglaw.com