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**Changes to FAA Registration Renewal Rules**

**By Kathleen H. Breckenridge**

 Several years ago, when the FAA changed the rules regarding registration of aircraft to require renewal of registrations every three years, the registered owner was required to complete the renewal process before the registration expired and if that did not happen the aircraft would be grounded until the renewal could be completed and the aircraft received a new permanent registration card. With that timeline in mind the renewal notices were sent out to owners a full 90 days prior to the expiration of the registration so that owners could be sure of receiving the new registration card in plenty of time before the old registration expired.

At that time, once the renewal registration was recorded the Registry would issue the new registration card within 7-10 days. If the new card was not received before the old registration expired the FAA would not allow the owner to fly on a temporary registration or to request a flywire to allow the aircraft to fly internationally. This left some owners who waited until the end of the 90 day notice period to file for their renewal registration without use of their aircraft while waiting for the renewal to be processed and the new registration card issued. Some owners who needed to use their aircraft were forced to effect a sale to a new entity to obtain a temporary registration and/or a flywire in order to be able to immediately use their aircraft once their registration had expired.

With the advent of FAA’s acceptance of electronic signatures, the demise of the two part FAA registration form which generated the “pink slip” temporary registration and the current registration backlog at the FAA (now at 7-10 weeks rather than 7-10 days for the issuance of permanent registrations for both new registrations and renewals) the FAA renewal registrations are processed in a very different manner.

The FAA still provides a 90 day notice period to the owner prior to the expiration of the registration and when the renewal application is filed prior to the expiration the owner may continue to fly on the current registration while waiting for the new registration card, until such time as it expires. Once the current registration expires, the owner may request a flywire from the FAA registry for either domestic or international travel that will occur after the expiration of the current registration and before the receipt of the permanent registration card.

If the registration expires before the renewal request is filed then the renewal request must be included with the request for the flywire. The flywires are usually issued within 12 to 24 hours after the request. The escrow companies in Oklahoma City are assisting with the filing of renewals and requests for flywires for a nominal charge. Keeping in mind the current problems with timely postal delivery, we recommend engaging one of the escrow companies to assist with renewal registrations that may be about to expire or have already expired.



Kathleen H. Breckenridge has represented private and corporate aircraft owners and operators for over fourteen years. She concentrates her practice in the areas of business and tax planning, U.S. aircraft export and import, acquisitions and sales, leasing, fractional ownership, and chartering and management of corporate aircraft. Ms. Breckenridge’s world-wide clients have benefited from her invaluable experience with complex international transactions. Ms. Breckenridge has authored articles for Business Aviation Advisors, World Aircraft Sales Management, China Daily, and Asia Weekly and she is registered to the Bar Association in Missouri, Kansas and Illinois. For more information please visit www.coolinglaw.com.