



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave
Washington, DC 20591

March 16, 2023

Exemption No. 18104B
Regulatory Docket No. FAA-2018-1076

Mr. Arjun Garg and Mr. Matthew Clark
Hogan Lovells US LLP
555 Thirteenth Street, NW
Washington, DC 20004

Dear Mr. Garg and Mr. Clark:

This letter is to inform you that the Federal Aviation Administration (FAA) has granted your petition to extend and amend Exemption No. 18104A. This letter transmits the FAA's decision, explains the FAA's basis, and provides the conditions and limitations of the exemption, including the date the exemption ends.

The Basis for the FAA's Decision

By letter dated February 2, 2023, you petitioned the FAA on behalf of Cirrus Design Corporation d/b/a Cirrus Aircraft (Cirrus) for an extension of and amendment to Exemption No. 18104A. That exemption from §§ 47.65 and 47.69(b) of Title 14, Code of Federal Regulations (14 CFR) allows Cirrus to obtain a Dealer's Aircraft Registration Certificate, AC form 8050-6, without meeting the United States citizenship requirements of Title 49 United States Code (U.S.C.) § 40102(a)(15), which permits Cirrus to conduct limited flights outside of the United States under the certificate for demonstration, sales, and marketing purposes. The amendment you request would change the exemption term from two years to five years.

In your petition, you indicate that there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

The FAA's Decision

The FAA has determined that good cause exists for not publishing a summary of the petition in the *Federal Register*. The FAA has determined that good cause exists because the requested extension of amendment to the exemption would not set a precedent and any delay in acting on this petition would be detrimental to Cirrus.

The FAA is not granting Cirrus's request to extend the exemption for a five year term. The petition does not establish how a longer exemption term is consistent with the applicable

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regulations under which the FAA evaluates petitions. In particular, Cirrus failed to show that extending the length of the exemption term to five years would be in the public interest, as 14 CFR § 11.81(d) requires. In addition, a two year extension allows the FAA to more appropriately evaluate both the circumstances necessitating the exemption and the safety of operations that occur under the exemption, consistent with 14 CFR § 11.81(e). A two year extension is consistent with other recently granted exemptions from 14 CFR §§ 47.65 and 47.69(b)¹. As such, the request to extend the exemption term to five years is denied.

The FAA has determined that the justification for the issuance of Exemption No. 18104A remains valid with respect to this exemption and is in the public interest. Therefore, under the authority provided by 49 U.S.C. §§ 106(f), 40113, and 44701, which the FAA Administrator has delegated to me, I hereby grant Cirrus Design Corporation d/b/a Cirrus Aircraft an exemption from 14 CFR §§ 47.65 and 47.69(b) to the extent necessary to allow Cirrus to obtain a Dealer's Aircraft Registration Certificate, AC form 8050-6, without meeting the United States citizenship requirements of Title 49 United States Code (U.S.C.) § 40102(a)(15), which permits Cirrus to conduct limited flights outside of the United States under the certificate for demonstration, sales, and marketing purposes, subject to the following conditions and limitations.

Conditions and Limitations

1. The aircraft must be owned by Cirrus as prescribed by 14 CFR § 47.67.
2. The aircraft must have a temporary registration number or an assigned registration number affixed as provided by 14 CFR Part 45.
3. When the aircraft does not have a standard airworthiness certificate, permission of the host country (countries) must be obtained before flights to or through that country.
4. Cirrus shall maintain records of each international flight for a period of one year after the aircraft returns to the United States, such records to consist of:
 - a. Registration number and manufacturer's serial number;
 - b. Dates of departure and return to the United States; and
 - c. General overseas itinerary.

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

¹ See, e.g., Exemption Nos. 18855 and 18824.

The Effect of the FAA's Decision

The FAA's decision amends Exemption No. 18104A to 18104B and extends the termination date to March 31, 2025, unless sooner superseded or rescinded.

To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2018-1076 (<http://www.regulations.gov>). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Sincerely,

/s/

Caitlin E. Locke

Acting Deputy Executive Director, Flight Standards Service