



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave  
Washington, DC 20591

Mr. Michael Gray  
Vice President of Operations  
Sky Palace Airways  
1101 E. Cumberland Avenue Suite 301  
Tampa, FL 33602

Dear Mr. Gray:

This is in response to your February 12, 2020, letter sent to the public docket (No. FAA 2020 0173) petitioning the Federal Aviation Administration (FAA) on behalf of Sky Palace Airways, for an exemption from § 121.424(a)(1), (b)(3), and (d)(1); item I (a) of Appendix E to part 121; and item I (b) of Appendix F to part 121 of Title 14, Code of Federal Regulations (14 CFR). That exemption, if granted, would allow Sky Palace Airways to conduct training and checking of pilots on airplanes that require two flight crewmembers for the required preflight inspection, both interior and exterior, using approved advanced pictorial means.

This letter is to inform you that relief from § 121.424(a)(1), (b)(3), and (d)(1); item I (a) of Appendix E to part 121; and item I (b) of Appendix F to part 121 for the required preflight inspection through exemption is no longer available. The Pilot Professional Development final rule (Amdt. 121-382, 85 FR 10896, February 25, 2020) eliminated the need for this relief. Under that rule, the FAA allows use of approved pictorial means to conduct training and checking of pilots for the required preflight inspection without the need of an FAA exemption. A certificate holder is required to obtain approval of the pictorial means from its Principal Operations Inspector to exercise this privilege. Additionally, in accordance with § 121.434(b)(3), if the preflight visual inspection is conducted by approved pictorial means during an initial, transition, conversion, or upgrade proficiency check, the pilot must also demonstrate proficiency to a check pilot on at least one complete preflight visual inspection of the interior and exterior of a static airplane before the completion of operating experience.

Because the relief you seek is now covered under the new rule, we will take no further action on your petition.

Sincerely,

Giles Strickler  
Director, Airmen and Airspace Rules Division

AFS-20-132744-E