LEGAL UPDATES

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FAA Updates Aircraft Registration and Certification Processes

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On January 17, 2025, the Federal Aviation Administration (FAA) announced two significant, pending regulatory changes regarding the digitization of aircraft registration and certification processes. These regulatory changes, found in two final rules published in the Federal Register (Docket Nos. FAA-2024-2764 and FAA-2024-2765), streamline the requirements for aircraft registration and recordation filing processes with the capabilities of the FAA's Civil Aviation Registry Electronic Services (CARES) system which will be fully implemented by late 2025.

Currently, the Civil Aviation Registry requires a physical stamp to denote the time and date of submission on original copies of each aircraft registration and recordation documents submitted to it for filing. The CARES system, which has been in development since 2022 and is intended to replace the current stamping process, provides a web-based electronic system for the aviation community to securely submit applications, upload documents, and provide other data necessary for aircraft registration applications and the recordation of other conveyance documents. As the CARES system nears full implementation later this year, the FAA has announced significant changes which will allow members of the aviation community filing registration or conveyance documents to more efficiently submit the necessary documents electronically.

Specifically, these recent changes replace previous requirements that original copies of documents be submitted via mail to the FAA for recording. Instead, applicants may now upload scans of manually executed or digitally signed documents, in some cases with even photocopies or digital images being acceptable. The CARES system will maintain digital document records that replace the need for document stamps. Prior to this change, the FAA estimated it may take up to seven to 10 business days for some registration documents to

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be stamped and returned to the applicant. With this move toward a digital repository of records, it is possible that the FAA can file and return recorded registration and conveyance documents in a fraction of that time.

What this means to you

These pending regulatory changes will likely lead to faster processing and delivery of certificates and other documents, reduced costs for the industry when registering aircraft or recording documents with the FAA, and improved efficiency of the aircraft transaction closing process. By allowing aircraft registration and conveyance documents to be issued electronically, parties to an aircraft transaction can likely expect a more streamlined closing process once the CARES system is fully implemented in late 2025.

Contact us

If you or your company plan to enter into an aircraft transaction, we encourage you to reach out to David Agee, Michael Cosby, Chris Sundberg, Lana Yaghi, or Ethan Schroeder to ensure that your aircraft transaction takes advantage of these latest developments.

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