



Fly Wire Best Practices: Putting a Solution in Place

Citing an increased workload to expedite registrations for international flight requests, the FAA's Aircraft Registry has proposed restricting access for expedited registration and issuing of temporary certificates of aircraft registration ("Fly Wires") to one Fly Wire per aircraft in any three-month period. We believe the answer to this issue does not reside in restricting FAA services; it lies in thinking differently about how to provide more efficient service for an ever-increasing demand.

Under the current system, the FAA's Aircraft Registry offers an expedited registration service whereby a Fly Wire may be approved within 72 hours, instead of the 22-day-average turn around for documents to be processed and a FAA AC Form 8050-3 Certificate of Aircraft Registration ("Registration Certificate") issued. An aircraft may not be flown outside the United States unless it has on board a Fly Wire or Registration Certificate. This service is not only appreciated by the industry, it is an absolute must for buyers who need to fly newly acquired, high capital investments out of the United States after closing. And today's business aircraft are specifically designed to do just that—Gulfstream's G550, Bombardier's Global Express, and Dassault's Falcon 900EX—are engineered to fly from the U.S. to Europe. Even smaller aircraft routinely fly to Mexico, the Caribbean and Canada from the United States. Increased demand for Fly Wires will also be generated by the very nature of burgeoning future markets in China, India, Africa and South America. Throw the growth of fractional companies in the mix—Flexjet Inc, Flight Options and NetJets—who must have their fleets available at all times for international flight—and clearly the industry needs more service, not less, for expedited registrations.

This issue reaches far beyond the general aviation community. American Airlines has the same problem if it needs two Fly Wires on one aircraft in three months. Since it is an industry wide concern, NARA believes there would be broad-based support to pay more for the service. The fee would apply across the board for general and commercial aviation and only users would pay: if you don't need to fly internationally on an expedited basis, you don't pay for it. Since a client would not pay more for a service he does not intend to use, this solution would also mitigate the number of bogus requests by users who want expedited services, but don't have a legitimate need for immediate international flight.

Another solution, albeit more administratively cumbersome, is for the FAA to authorize approved industry representatives, who are appropriately trained and screened, to act on behalf of the FAA's Aircraft Registry. This has been a standard FAA practice with DARs (Designated Airworthiness Representatives), and DERs (Designated Engineering Representatives), so the precedent has been set. We propose DARRs (Designated Aircraft Registration Representatives) for fractional companies and title companies. Empowering the fractional companies with their own in-house employee authorized to process expedited registrations and Fly Wire requests lessens demands made on FAA personnel and fosters more efficiency at the same time. Similarly, title and escrow companies who routinely file paperwork on behalf of brokers and dealers could be sanctioned in the same manner.

At a time when the FAA is intent on finding a way to reduce expedited registrations, it should be focused on finding a solution that will expedite more of them. NARA believes the solution lies in either charging more for the service, or approving DARRs.