



# Federal Aviation Administration

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## Memorandum

Date: December 21, 2015

To: See Distribution List

From:  Susan J. M. Cabler, Acting Manager, Design, Manufacturing, & Airworthiness Division, AIR-100 

Prepared by: Airworthiness Certification Section, AIR-113

Subject: Deviation to FAA Order 8130.34C, *Airworthiness Certification of Unmanned Aircraft Systems and Optionally Piloted Aircraft*

Memo No.: AIR100-15-110-DM63

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Title 14 of the Code of Federal Regulations (14 CFR) part 48, Registration and Marking Requirements for Small Unmanned Aircraft, allows small unmanned aircraft to either be registered and marked in accordance with part 48, or with the registration requirements in part 47 and marking requirements in subparts A and C of part 45.

Under part 48, small unmanned aircraft are provided a unique identifier during the registration process. The unique identifier must be maintained in a condition that is legible and affixed to the aircraft by any means necessary to ensure that it will remain affixed for the duration of each operation. The unique identifier must be readily accessible and visible upon inspection of the aircraft. A unique identifier enclosed in a compartment is readily accessible if it can be accessed without the use of any tool. Unlike part 45, there are no size, location, or contrast requirements for marking small unmanned aircraft under part 48. Nationality marks are not required in part 48. Furthermore, under part 48 there is no requirement for an experimental aircraft to be identified with the word “experimental” nor is there a requirement for a fireproof identification plate.

This deviation memorandum authorizes the following changes in FAA Order 8130.34C:

- 1) Paragraph 1 on page 3-1, delete the first sentence.
- 2) Paragraph 10c on page 3-5, change to read, “Documentation showing aircraft registration.”
- 3) Paragraph 7a(2) on page 3-7, change to read, “Review the documentation provided by the applicant to determine that the registration requirements of 14 CFR part 47, or part 48, as applicable, have been met.”
- 4) Paragraph 7b(1) on page 3-8, change the paragraph to read, “Markings are in accordance with part 45, alternate marking approval from AIR-100, or part 48.”

5) Paragraph 7b(2) Note on page 3-8, change the first sentence to read, “Except for small unmanned aircraft, experimental certificate applicants must attach a fireproof identification plate to their aircraft that meets the requirements of § 45.11, Marking of products.”

6) Operating limitation 1g(1) on page A-3, change to read, “This UA must be marked with U.S. nationality and registration marks in accordance with 14 CFR part 45, or with its unique identifier in accordance with 14 CFR part 48, (select as applicable).”

7) Delete item i, Unmanned Aircraft (UA) on page F-1. Unmanned aircraft has been included in the definitions listed in 14 CFR part 1.

If you have any questions, please contact the Airworthiness Certification Section, AIR-113, at 202-267-1575.

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