



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

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

July 8, 2024

Tiziano Bernard
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Dear Tiziano Bernard:

Thank you for the request for a legal interpretation submitted by electronic mail on June 6, 2024. In regard to your first question, the Office of the Chief Counsel notes that the Ochoa letter you reference is a policy office response and not a legal interpretation issued by our office. If you would like assistance from the Office of Safety Standards in the Flight Standards Service, which is responsible for the subject matter addressed in the policy response, you may submit your inquiry to 9-AFS-800-correspondence@faa.gov. In regard to your second question, please see *Legal Interpretation to Moody* (Feb. 3, 2015), enclosed herein, which states that, “[b]ecause a legal interpretation constitutes an official FAA position that has FAA-wide application and because a FSDO is part of the FAA, a legal interpretation issued by the Office of the Chief Counsel is binding on the FSDO.”

Sincerely,

Adam Runkel
Deputy Assistant Chief Counsel for Regulations

Enclosures:
Legal Interpretation to Moody (Feb. 3, 2015).