

FAR47.33(c) ".....If he built the aircraft from a kit, the applicant must also submit a bill of sale from the manufacturer of the kit."

PROPOSED CHANGE: recommend the above sentence be changed to read: "If he built the aircraft from a kit, the applicant must also submit a bill of sale or invoice from the manufacturer of the kit."

REASON FOR ADDING "or INVOICE": The requirement of a bill of sale causes an administrative burden on both the FAA and the aircraft builder. It is presumed that the FAA's goal in requiring this documentation is that they want to establish that a particular kit was the starting point in the construction of the aircraft regardless of the Make/Model listed by the amateur builder. This can be accomplished with an invoice. The requirement for a bill of sale results in a disproportionate number of rejected applications for registration since most manufacturers do not provide a bill of sale with the delivery of a kit. Instead an invoice is provided.