October 28, 1991

Mr. Curtis W. Klos
Chief Pilot
The Silicon Valley Express
4242 Ensenada St.
Denver, CO 80249-6561

Dear Mr. Klos:

This is in response to your letter of October 11, 1991, inquiring into the purpose for the requirement for duplicate copies of load manifests stated in Federal Aviation Regulation § 135.63(c), (14 CFR).

As § 135.63(d) of the regulation explains, one copy of the load manifest shall be carried in the aircraft while the other copy is retained by the carrier at its operations base or other approved location. The load manifest is to be completed before takeoff. Information recorded on the manifest, such as the total weight of the aircraft and the center of gravity of the aircraft, would be relevant in the event of a crash or destruction of the aircraft. Retention of a duplicate copy of the manifest outside of the aircraft avoids the risk of accidental destruction of the original and only copy of that document.

Part 135.63 was published for public comment before the regulation became final. As the enclosed excerpt from the rulemaking history indicates, the agency considered the administrative inconvenience associated with preparing load manifests and concluded that safety required preparation of as load manifest for multiengine aircraft.

Thank you for your interest in aviation safety. Do not hesitate to call if we may be of further assistance.

Sincerely,

GEORGE L. THOMPSON
Assistant Chief Counsel