April 11, 1994

James L. Lane, Esq.
[redacted]

Dear Mr. Lane:

This is in response to your letter of April 7, 1994. You requested our opinion as to whether a U.S. corporation, which is a wholly-owned subsidiary of a Canadian corporation, may obtain an operating certificate under Part 133 of the Federal Aviation Regulations.

We have reviewed Part 133 and its regulatory history and find no prohibition against the U.S. corporation from holding a Part 133 Rotorcraft External-Load Operator Certificate.

Please contact us if we may provide you with further assistance.

Sincerely yours,

John J. Callahan
Deputy Assistant Chief Counsel