**1994 WL 16479553 (D.O.T.)**

Department of Transportation (D.O.T.)

Federal Aviation Administration

**Legal Interpretation**

Interpretation 1994-4
March 11, 1994

**Mr. Bramble**

***1** This is in response to your request for an interpretation of the Federal Aviation Regulations (FAR) concerning the lighting requirements for a tethered hot air balloon.

A tethered hot air balloon is considered an aircraft and must be operated in compliance with all the operating, certification, and airworthiness regulations applicable to aircraft. FAR § 91.209(a) and (b) describe the requirements for displaying aircraft position lights. Additionally, when a tethered hot air balloon is parked or moved in a night flight operations area, or the balloon is operated at night, it must have lighted position lights.

Both tethered and manned free balloons must comply with the airworthiness standards for FAR Part 31. FAR § 31.65 specifically describes the location requirements for position lights on a hot air balloon. If position lights are installed, there must be one steady aviation white light and one flashing aviation red (or one flashing aviation white) position light. The steady white light must be located not more than 20 feet below the basket, trapeze, or other means for carrying occupants. The flashing red or white light must be located not less than 7, nor more than 10, feet below the steady white light. Therefore, it is possible to arrange the position lights so that they are not more than 10 feet below the basket.

A moored balloon is a balloon that is secured to the earth by several mooring lines and does not carry a person. Moored balloon operations must be conducted in accordance with FAR Part 101, which contains lighting and marking requirements for moored balloons and kites. Section 101.17 provides the lighting requirements for daytime and nighttime balloon/kite operations. For operations between sunset and sunrise, the balloon and its mooring lines must be lighted so as to give visual warning equal to that required for obstructions to air navigation in the Federal Aviation Administration publication ““Obstruction Marking and Lighting.” For operations between sunrise and sunset, the mooring lines must have colored pennants or streamers attached at not more than 50 foot intervals beginning at 150 feet above the surface of the earth and visible for at least one mile.

If you have any further questions, please contact Lorelei Dinges of my office on (202) 267-3491. We hope this interpretation will be of assistance to you.

Donald P. Byrne
Assistant Chief Counsel
Regulations Division

**1994 WL 16479553 (D.O.T.)**

**End of Document** © 2026 Thomson Reuters. No claim to original U.S. Government Works.