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

SEP 28 2007

Jennifer Trock, Esquire
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, NW
Washington, DC 20037-1122

RE: Airship Operations

Dear Ms. Trock:

In an email communication dated August 17, 2007, you requested the FAA to confirm your understanding as follows:

"Airships are not subject to the requirements of Part 119, 121, 135, or 136, but instead may operate under the rules of Part 91, including sightseeing and other operations for hire, provided they comply with Part 91 requirements (especially now that the prior exception in 119 was recently eliminated and the new air tour rule excludes airships). Because (1) Part 135 applies only to "commuter or "on-demand operations" of operators required to hold a certificate under Part 119; and (2) the Part 119 definitions of "commuter" and "on-demand operations" apply only to "airplanes" (defined in section 1.1 as "an engine-driven fixed-wing aircraft heavier than air. . .") and "rotorcraft" (defined in section 1.1 as "a heavier-than-air aircraft that depends principally for its support in flight on the lift generated by one or more rotors"), Part 91 would govern airship operations."

The FAA confirms your understanding as appropriate for airship operations.

This response was prepared by Bruce Glendening, Attorney in the Regulations Division of the Office of the Chief Counsel. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

Rebecca MacPherson
Assistant Chief Counsel for
Regulations Division,,AGC-200