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

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

NOV 10 2010

Bombardier Learjet
David M. Coleal
Vice President & General Manager
P.O. Box 7707
Wichita, Kansas 67277-7707

Subject: Legal Interpretation - Learjet Model 60 Tire Pressure Check using Passive Electronic Device

Dear Mr. Coleal,

This responds to your July 30, 2010, follow-up request for a legal interpretation on the subject of whether the pilot of a Learjet Model 60 (hereafter "Learjet") operated under part 91 or 135, Title 14 of the Code of Federal Regulations (C.F.R.), may perform daily tire air pressure checks as a preflight task. Your current request is distinguished from the first to the extent that it concerns the use of a passive tire pressure monitoring system, as opposed to the pilot manually performing the check.

For purposes of background, you reference our February 26, 2009 legal interpretation (hereafter "2009 interpretation"), and records of subsequent communications conducted by telephone and email between representatives of Bombardier Learjet and Federal Aviation Administration (FAA) officials. These communications concerned the subject of checking tire pressure on the Learjet using a passive monitoring system.

The use of an FAA accepted passive tire pressure monitoring system (passive system) minimizes the likelihood for inaccurate tire pressure readings caused by the pilot. Inaccurate tire pressure readings can occur when a pilot manipulates the valve stem while using a tire pressure gauge. The passive system uses wireless sensors embedded in the tire inflation valve stem to transmit tire pressure and temperature data to a remote display unit from which the pilot obtains needed data without manipulating the valve stem. The risk of an inaccurate reading caused by the pilot is thereby minimized. For the reasons discussed above, we conclude that the pilot of a Learjet Model 60, operated under part 91 or part 135, may perform daily tire air pressure checks as a preflight task if an FAA-accepted passive system is used.

We trust that the information provided above is responsive to your inquiry. This interpretation was prepared by Viola Pando, an Attorney in the Regulations Division,

Office of the Chief Counsel, and coordinated with the Aircraft Maintenance Division (AFS-300) of the Office of Flight Standards. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel for Regulations, AGC-200