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

Office of the Chief Counsel

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

FEB 16 2011

David J. Culver
Vice President & General Manager
Island Air Charters
1050 Lee Wagener Blvd.
Suite 102 & 104
Fort Lauderdale, FL 33315

Dear Mr. Culver,

This is in response to your letter requesting a legal interpretation of the term "recommended" as it appears in FAA Order 8900.1, Flight Standards Information System (FSIMS).

FSIMS is an internal order, maintained by the Flight Standards division of the FAA, that "directs the activities of aviation safety inspectors (ASIs) responsible for the certification, technical administration, and surveillance of air carriers, certain other air operators conducting operations in accordance with the appropriate part of Title 14 of the Code of Federal Regulations (14 CFR), certificated airmen, and other aviation activities. This order also provides direction for tasks related to aircraft accidents and incidents, investigations and compliance, the aviation safety program, administrative areas, and miscellaneous tasks not related to a specific regulation. In addition, it contains regional and district office requirements for the support of ASIs responsible for those activities." FSIMS 8900.1 1-1.

Legal interpretations are generally issued to address questions regarding the regulations found in Title 14 of the Code of Federal Regulations (14 CFR). Because your issue specifically addresses established internal policy, a legal interpretation is not appropriate at this time. You are welcome to contact the General Aviation and Commercial Division at 202-267-8212 to discuss your concern and ask for their understanding of the policy as it applies to your situation.

I hope this information has been helpful. If you have further questions concerning this response, please contact Sabrina Jawed on my staff at 202-267-3073.

Sincerely,

Rebecca MacPherson
Assistant Chief Counsel for Regulations, AGC-200