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

Office of the Chief Counsel

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

OCT 23 2015

Mr. Tony Thompson
President, Quantum Airways
344 Hauser Boulevard
Unit 5-305
Los Angeles, CA 90036

Re: Request for Legal Interpretation of 14 C.F.R. Part 119, *Certification: Air Carriers and Commercial Operators*

Dear Mr. Thompson:

On August 11, 2015, the Federal Aviation Administration (FAA) issued an interpretation to you that responded to your March 29, 2015 letter. In your letter, you asked whether 14 C.F.R. §119.5(k), *Certifications, authorizations, and prohibitions*, would prohibit Quantum Airways, which plans in the future to become a part 135 certificated air carrier offering scheduled service, to advertise for purposes of raising pre-certification capital from equity investors and crowd funders.

In subsequent communications with this office, you have advised that in retrospect, your request should have been limited to crowdfunding as a source of pre-certification capital and not included equity investing. You advise that the August 11, 2015 interpretation's use of the term "investment" could be misunderstood to refer solely to equity investing and not also to crowdfunding donations.

This letter is to confirm that §119.5(k) would not prohibit the pre-certification advertising of Quantum Airways as a potential crowdfunding opportunity consistent with the analysis in our August 11, 2015 interpretation.

Sincerely,

Lorelei Peter
Acting Assistant Chief Counsel
for Regulations, AGC-200

Enclosure: Interpretation from Lorelei Peter, Deputy Assistant Chief Counsel for Regulations, FAA, to Tony Thompson, President, Quantum Airways (August 11, 2015).