



U.S. Department
of Transportation

**Federal Aviation
Administration**

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

October 28, 2016

Exemption No. 11104A
Regulatory Docket No. FAA-2013-0508

Mr. Edgar D. Pitman
Member/Manager
Pitman Air LLC
1840 Airport Blvd.
Red Bluff, CA 96080

Dear Mr. Pitman:

This letter is to inform you that we have granted your petition to extend Exemption No. 11104. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

The Basis for Our Decision

By letter dated July 15, 2016, you petitioned the Federal Aviation Administration (FAA) on behalf of Pitman Air LLC (Pitman) for an extension of Exemption No. 11104. That exemption from §§ 91.309(a)(2) and 91.309(a)(3) of Title 14, Code of Federal Regulations (14 CFR) allows owners of the Dragonfly Special Light Sport Aircraft (SLSA) and Experimental Light Sport Aircraft (ELSA) aircraft certificated under §§ 21.190 and 21.191(i)(1), manufactured by Pitman Air LLC, equipped with the Bailey Tow & Release System to tow aircraft and be in compliance with the issued operation limitations under §§ 91.327(a)(1) and 91.319(e)(1), as applicable. Operators of the Dragonfly aircraft that opt to utilize the Bailey Tow and Release System on their Dragonfly aircraft must follow the Conditions and Limitations of that exemption.

In your petition, you indicate that there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested extension of the exemption would not set a precedent, and any delay in acting on this petition would be detrimental to Pitman.

AFS-16-14096-E

Our Decision

The FAA has determined that the justification for the issuance of Exemption No. 11104 remains valid with respect to this exemption and is in the public interest. Therefore, under the authority provided by 49 U.S.C. §§ 106(f), 40113 and 44701, which the FAA Administrator has delegated to me, I grant Pitman Air LLC (Pitman) an exemption from 14 CFR §§ 91.309(a)(2) and 91.309(a)(3) to the extent necessary for owners of the Dragonfly SLSA and ELSA aircraft certificated under §§ 21.190 and 21.191(i)(1), manufactured by Pitman equipped with the Bailey Tow & Release System to tow aircraft and be in compliance with the issued operation limitations under §§ 91.327(a)(1) and 91.319(e)(1), as applicable. Operators of the Dragonfly aircraft that opt to utilize the Bailey Tow and Release System on their Dragonfly aircraft must follow the Conditions and Limitations of this exemption, subject to the conditions and limitations listed below.

Conditions and Limitations

1. The owner/operator will utilize the Bailey Tow and Release System only on the Pitman Air Dragonfly Light Sport Aircraft (LSA) certificated under §§ 21.190 and 21.191(i)(1) of Title 14 Code of Federal Regulations.
2. The owner/operator will maintain and operate the tow hook assembly utilizing the Operation, Maintenance & Inspection Instructions for the Bailey Tow and Release System.
3. The information in the Dragon LSA maintenance manual and pilot operating handbook (POH) must meet the requirements of American Society for Testing and Materials (ASTM) standard F2245 Annex A1.1 through A1.7, when the aircraft is equipped for towing.
4. For tow operations, the Dragon LSA operator must meet the 100 hour inspection requirements of §§ 91.319(g)(1) or (g)(2), or 91.327(c)(1) or (c)(2), of Title 14 Code of Federal Regulations as certificated.
5. A copy of this exemption must either be incorporated into the aircraft POH or carried on the aircraft while operating under this exemption.

The Effect of Our Decision

This exemption terminates on November 30, 2018, unless sooner superseded or rescinded.

Sincerely,

A handwritten signature in blue ink that reads "John Barbagallo". The signature is written in a cursive style with a large initial "J" and "B".

John Barbagallo
Deputy Director, Flight Standards Service