



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

Aviation Safety

800 Independence Ave  
Washington, DC 20591

Exemption No.11104C  
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 the Federal Aviation Administration (FAA) has granted your petition to extend Exemption No.11104B. It transmits the FAA's decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

### **The Basis for the FAA's Decision**

By letter dated August 18, 2020, you petitioned the FAA on behalf of Pitman Air LLC (Pitman) for an extension of Exemption No. 11104B. 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) 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 §§ 91.3279(a)(1) and 91.319(e)(1), as applicable. Operators of the Dragonfly Light Sport Aircraft (LSA) that opt to utilize the Bailey Tow and Release System on their Dragonfly LSA 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's Decision**

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.

The FAA has determined that the justification for the issuance of exemption No.11104B remains valid with respect to this exemption and is in the public interest. Therefore, under the authority

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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 §§ 91.309(a)(2) and 91.309(a)(3) to the extent necessary to allow owners of the Dragonfly Special Light Sport Aircraft (SLSA) and Experimental Light Sport Aircraft (ELSA) 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 §§ 91.3279(a)(1) and 91.319(e)(1), as applicable, subject to the conditions and limitations below. Operators of the Dragonfly Light Sport Aircraft (LSA) that opt to utilize the Bailey Tow and Release System on their Dragonfly LSA must also follow the conditions and limitations 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 Dragonfly 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 Dragonfly 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.

If you request an extension to this exemption, please submit your request by using the Regulatory Docket No. FAA-2013-0508 (<http://www.regulations.gov>). In addition, you should submit your request no later than 120 days prior to the exemption's expiration date listed below.

If you require an amendment to this exemption, please submit your request no later than 120 days prior to the date you need the amendment using the process indicated above.

Any extension or amendment request must meet the requirements of § 11.81 of 14 CFR.

### **The Effect of the FAA's Decision**

The FAA's decision amends Exemption No.11104B to 11104C and extends the termination date to November 30, 2022, unless sooner superseded or rescinded.

Sincerely,

**ROBERT  
C CARTY** Digitally signed  
by ROBERT C  
CARTY  
Date: 2020.11.18  
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Enclosure