

## SALES MEMO

April 12, 2005

TO: All Sales and Engineering Staff  
FROM: Mike Sellers  
Marketing and Sales Manager

RE: CONVERSION OF ERCOUCPE 415-D TO 415-C DESIGNATION

There continues to be some confusion regarding “converting” a 415-D to a 415-C. **However, two main schools of thought have formed: The Type Certificate Holder way (us) and the FSDO way (Flight Standards District Office).**

1. The Ercoupe Type Certificates provide for the conversion of the 415-C and 415-CD to the 415-D model, but there is nothing in the original design data to address the issue of going back. We have spent considerable amount of time researching this matter including seeking the opinion of our chief inspector with MIDO in Los Angeles. Our conclusion is that a 415-D cannot be converted to a 415-C because of a change in the FARs. 14 CFR Part 1, as now currently amended, 1.1 General definitions states:

Light-sport aircraft means an aircraft, other than a helicopter or powered-lift that,

Since its **original certification, has continued** to meet the following:

- (1) A maximum takeoff weight of not more than-
- (ii) 1,320 pounds (600 kilograms) for aircraft not intended for operation on water;

(Ref. p. 355 of the Final Rule of the Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft)

**So Univair’s Official Policy is:** When a 415-C or 415-CD was converted to a 415-D, it was approved from a gross weight of 1,260 lbs. to 1,400 lbs. Since the aircraft has not been continuously operated at or below 1,320 lb. since its original certification, the aircraft does not appear to be able to be operated as a Light-sport aircraft.

2. At the very beginning of this issue, management has preferred that this conversion issue be a matter best resolved by the customer’s local FSDO. To that end many FSDOs have allowed the re-designation of a D model to a C model. A common belief among many FSDO personnel is an aircraft remains as the model it was originally built. The aircraft was only modified to a later specification, but the model remains the same. John Wright Jr. of Springfield, IL has had considerable luck in re-designating several aircraft through the Springfield FSDO. **Should other FSDOs or customers contact us for guidance on how this process might be accomplished, WE RECOMMEND THAT THEY CONTACT THE SPRINGFIELD, IL FSDO AT 217-744-1910** as they are familiar with process.

Some Ercoupe owners may wonder that since Univair owns the Ercoupe Type Certificates, we may have some additionally leeway with the FAA. We don’t see how we can circumvent the FARs as now amended in 14 CFR 1.1 (1)(ii).