



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

Flight Standards District Office

6020 28th Avenue South  
Room 201  
Minneapolis, MN 55450-2704

August 22, 2005

Dan Mattsen  
9450 Hudson Blvd.  
Lake Elmo, MN 55042

Dear Mr. Mattsen:

Engine-driven electrical system.

After conferring with the Van Stumpner, FSS Regulatory Support Division, Larry Werth, Small Airplane Directorate and Rotex/Bombardier the following consensus was reached.

1. If the builder/owner elects to utilize the engine lighting coil (generator coil) by installing the required voltage regulator/rectifier, installs a battery, electric starter, associated wiring, switches and circuit protection devices, the aircraft would be considered to have an engine-driven electrical system. This would require them to comply with 14 CFR section 91.215, ATC Transponder and Altitude Reporting Equipment and Use.
2. A generator may be belt driven or direct drive.
3. 14 CFR section 91.215 is applicable to all aircraft certificated in any category except those specifically excluded (i.e. balloon, glider, etc.).

If you have any other questions or concerns, please feel free to contact me at 612-713-4227.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry D. Johnson".

Barry D. Johnson  
Aviation Safety Inspector