

**GRAND FORKS COUNTY
STATES ATTORNEY**

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December 2, 2011

Mr. Dean Fulmer, Acting Air Traffic Manager
Unmanned Aircraft Systems Office
Federal Aviation Administration
490 L'Enfant Plaza
Washington, DC 20024

Re: Political Subdivision Definition

Dear Mr. Fulmer,

Pursuant to a request from the Federal Aviation Administration, the Grand Forks County Sheriff's Department has requested that I provide you with a letter validating that Grand Forks County is a political subdivision of the State of North Dakota.

North Dakota Century Code (N.D.C.C.) 32-12.1-02(6) defines a political subdivision. That statute includes the following language: "Political subdivision . . . [i]ncludes all counties. . .". N.D.C.C. 32-12.1-02(6). Accordingly, Grand Forks County, as a county within the State of North Dakota, is a political subdivision of the State of North Dakota. The Grand Forks County Sheriff is a constitutional office of the County of Grand Forks, per the Constitution of the State of North Dakota. Accordingly, it is part of the Grand Forks County government.

Upon review of 49 USC 40102(a)(41)(D) it is my opinion that Grand Forks County is a political subdivision as defined in that statute. In addition, it is acknowledged that Grand Forks County is incurring responsibility for operating a public aircraft pursuant to 49 USC 40125.

Thank you for your time and your consideration. Please contact me if you have any comments or questions regarding this matter.



Peter D. Welte
Grand Forks County State's Attorney