March 15, 1993

Mr. Troy Wambolt

[redacted]

Dear Mr. Wambolt:

This letter is written in response to your letter to the Northwest Mountain Regional Office, dated February 24, 1993. In your letter you requested clarification with regard to the cross-country flight requirements for an airline transport pilot certificate in Part 61 of the Federal Aviation Regulations.

As you note in your letter, the cross-country flight requirements for an instrument rating, and student, private, and commercial certificates are set forth with particularity in the relevant FARs. However, FAR 61.155(b)(2)(i) does not impose a landing or mileage requirement.

There is no legal definition of the term "cross-country flight." Whether specific flight experience is cross-country in character is a technical determination to be made the FAA Flight Standards Service. It is the position of Flight Standards Service that, for pilots holding a commercial pilot certificate, the following flight experience as a required pilot flight crewmember is cross-country in character:

1. Any flight time acquired in an operation under Part 121, 123, or 135 of the Federal Aviation Regulations, when a landing is made at a point other than the point of departure, regardless of the distance between the two points.

2. Any flight time acquired in an operation under Part 91, 127, or 137, when a landing is made at a point other than the point of departure, regardless of the distance between the points, and when the flight requires the use of one of the following:

    (a) Dead reckoning navigation.
    (b) At least two navigation facilities.
    (c) A sole source airborne navigation device.

3. Any military flight time by a military pilot who qualifies for a commercial pilot certificate under section 61.73 based on military competency, when the flight involves a travel distance of more than 50 nautical miles from the point of departure, regardless of whether a landing is made at a point other than the point of departure.

I hope that this response addresses the question that you raised in your letter of February 24, 1993.

With best regards,

PHILIP G. POMPILIO
Staff Attorney