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

800 Independence Ave., S.W.
Washington, D.C. 20591

DEC 21 2006

Fran DeJoseph
Asheville Jet Charter and Management, Inc.
1800 Airport Road
Kennesaw, GA 30144

RE: Request for Interpretation of Training Program Special Rules

Dear Mr. DeJoseph:

This letter responds to your request dated October 27, 2006, for an interpretation of the rules applicable to training programs administered under 14 C.F.R. part 142. Specifically, you ask whether a training center certificated under part 142 could have a training program approved under part 121 or part 135.

A part 142 training center does not hold a certificate authorizing part 121 or part 135 operations, and may not have its training programs approved in accordance with those parts. Instead, training center programs are approved under part 142, and may be "approved for use" in part 121 or part 135 operations by the part 121/135 operator's Principal Operations Inspector.

This interpretation does not mean that a part 142 training center must have an air carrier or commercial operating certificate in order to conduct training for part 121 or part 135 operators. Instead, this interpretation clarifies that a part 142 training program is always a part 142 training program, even if it is approved for use in part 121 or part 135 operations by the operator's Principal Operations Inspector. The fact that a part 121 or part 135 operator adopts the training center's program as its own, does not give the training center the authority to advertise or promote itself as having part 121 or part 135 training programs. Rather, the training center is limited to the authority granted in part 142, and may only describe its training programs as having been approved for use in some part 121 or part 135 operations.

This interpretation was prepared by the Operations Law Branch of the Office of the Chief Counsel and also coordinated with the Air Transportation Division of Flight Standards Service. We trust that this response adequately addresses your request. Please contact Joe Conte of my staff at the address provided above, or by phone at (202) 267-3073, if we can be of further assistance.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel for
Regulations, AGC-200