U.S. Department
of Transportation

**Federal Aviation
Administration**

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

August 3, 2006

James W. Johnson
Airline Pilots Association, International
535 Herndon Parkway
P.O. Box 1169
Herndon, VA 20172

Dear Mr. Johnson:

In a letter dated April 5, 2006, you inquired about the accounting of time spent by airmen who are providing "special airport qualification checks." You specifically asked whether a "special airport qualification" airman, who may not always be qualified in the aircraft, must count an airport qualification flight toward the flight limitation regulations. You further state that the special airport qualification airman is "required" to be present for the aircraft to land.

Title 14, Code of Federal Regulations (14 CFR) section 121.445(b) states in relevant part:

> [N]o certificate holder may use any person, nor may any person serve, as pilot in command to or from an airport determined to require special airport qualifications unless, within the preceding 12 calendar months: (1) the pilot in command or second in command has made an entry to that airport (including a takeoff and landing) while serving as a pilot flight crewmember; or (2) the pilot in command has qualified by using pictorial means acceptable to the Administrator for that airport.

An aircraft operating under part 121 may land at a special airport only if the flight crew meets the requirements specified in section 121.445. In preparing this response, we made our own inquiry which brought additional facts to light. It is our understanding that in this particular case the pilot has already met the requirements of 14 CFR § 121.445(b) by pictorial means and that the "special airport qualification" airman is not serving as a required flight crew member. Rather, his or her presence in a cockpit observer seat is an added safety measure employed by the particular air carrier. Therefore, time aloft does not count toward the flight time limits since the "special airport qualification" airman is not serving as a required flight crew member.

This response was written by Naveen Rao of my staff. We trust this answers your question. Thank you for your inquiry.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel, Regulations