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

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

Tom Morris
[redacted]

Dear Mr. Morris:

In a letter dated March 9, 2006, you inquired whether you could record as pilot-in-command (PIC) time, the periods during which you were the 'sole manipulator of the controls' of a United States Air Force (USAF) KC-135 pursuant to Title 14, Code of Federal Regulations. (14 CFR) section 61.51(e)(1)(i). The pertinent facts you provided are that you are a rated military pilot that serves as a co-pilot and that you have completed pilot proficiency checks in the KC-135. 14 CFR § 61.51(e)(1)(i) states in relevant part:

> A sport, recreational, private, or commercial pilot may log pilot-in-command time only for that flight time during which that person—is the sole manipulator of the controls of an aircraft for which the pilot is rated or has privileges;

We would consider you rated in the aircraft, which in the civilian version (Boeing 707) requires a type rating, by virtue of having completed the pilot proficiency check. Thus, in evaluating your military flight time, we would treat the time as PIC time under section 61.51(e)(1)(i).

Thank you for your inquiry. If you have any questions please feel free to contact Naveen Rao of my staff at (202) 267-3073.

Sincerely,

Rebecca MacPherson
Assistant Chief Counsel for Regulations