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

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

Mr. Gregory S. Winton, Esq.
[redacted]

RE: Request for Interpretation of FAA Order 8400.10 and Title 14 C.F.R. §§ 135. 293 and 135.297

Dear Mr. Winton,

This is in response to your letter of May 11, 2006 requesting an interpretation of FAA Order 8400.10 and §§ 135. 293 and 135.297 of the Federal Aviation Regulations.

Specifically, you asked if recurrent training is administered in modules, must the operator: 1) record each element of the module as it is completed, 2) record each module as it is completed, or 3) make one record when all of the modules are complete. You provide the following example: in February 2005 a crewmember completes an initial training program and the airman competency check required by § 135.293. One month later, the airman attends an FAA approved aviation training center[1] and completes the recurrent training required by §§ 135.293 and 135.297. Based on that scenario, you asked if the operator could make a single record of the entire curriculum in March 2005, or is the operator required to note when each individual element or each individual module is completed?

Modular Approach to Recurrent Training

As you stated in your letter, operators may administer the required recurrent training in modules. When an operator adopts a modular approach for recurrent training, all recurrent training elements and events must be grouped into specific modules to be administered and recorded as a recurrent training curriculum. The modules for Part 135 are composed of two parts. One part consists of the written or oral test elements, and the other part consists of the flight training and checking events. Because the ground and flight training elements are distinct and separate parts, they may be completed at different times. Nevertheless, they comprise a single module. An operator may record when each module is complete or may record when all of the modules are complete, but is not required to record when each element of a module is complete.

Recurrent Training and Eligibility Period

To answer your question, it is helpful to first explain recurrent training and eligibility period. Recurrent training is the training conducted for flight crewmembers who have been previously trained and qualified by the operator, who are continuing to serve in the same duty position and

[1] Attendance at an FAA approved aviation training center is permitted if the person conducting the training is authorized by the FAA. *See* 14 C.F.R. § 135.321(a)(1) (2006).

aircraft type, and who must receive recurring training and/or checking within a specific eligibility period to maintain currency. The eligibility period is a three-month period comprised of the month before the month in which training is due, the month in which training is due ("base month"), and the month after the month in which training is due ("grace month"). Recurrent training or checking that is completed any time during the eligibility period is considered to have been completed during the base month. A crewmember who has not completed all recurrent training or checking requirements in the base month may be scheduled and continue to serve in revenue service during the remainder of the eligibility period (*i.e.* until the end of the grace month), but may not serve after the end of the grace month. A flight crewmember who fails to complete all required training and qualification modules before the end of the eligibility period must complete requalification training before serving in revenue operations.

Recurrent training may occur periodically throughout the year, and the operator must record the actual date that the training is completed. However, for purposes of calculating when recurrent training is due next, the base month does not change as long as the training is completed before the end of the eligibility period. In the example above, the pilot completed initial training in February 2005. Therefore, the pilot's base month is February, and the pilot must complete recurrent training no later than March 31, 2006 (*i.e.* 12 months plus the grace month). The pilot must also complete the instrument proficiency check required by § 135.297 no later than September 30, 2005 (*i.e.* six months plus the grace month). If the pilot undergoes recurrent training in March *2005* after completing initial training in February 2005, the operator has two options. The operator could change the base month from February to March, and the pilot would be required to complete recurrent training again no later than April 30, 2006 (*i.e.* 12 months plus the grace month). The operator must record the actual date that the training is completed, but should designate March as the base month for recurrent training. Alternatively, the operator could keep February as the pilot's base month since initial training was completed in that month. In that case, the pilot would be required to complete recurrent training no later than March 31, 2006. Again, the operator must record the actual date that the training was completed, but would designate February as the base month for recurrent training.

Your second question involves whether an operator may adjust a crewmember's base month by administering recurrent training before it is due. As explained above, the answer to that question is yes. Operators may "reset" the recurrent training clock at any time by giving recurrent training earlier than it is required. The operator must ensure, however, that all required recurrent training is completed within the 12 calendar months preceding service in part 135 operations as required by the regulations. For example, if a pilot completes initial training in February 2005, the pilot would be due for recurrent training no later than March 2006. However, the pilot could undergo recurrent in June 2005 and change the base month from February to June. In that case, recurrent training would not be due again until July 31, 2006.

The same rules apply for the instrument proficiency check, except that there is a six month look-back period as opposed to the 12 month look-back period applicable to recurrent training. Therefore, the operator and pilot must ensure that the instrument proficiency check has occurred within the six months preceding service in IFR operations under part 135.

This interpretation was prepared by the Operations Law Branch of the Office of the Chief Counsel and coordinated with the Air Transportation and Aircraft Dispatch Divisions 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 MacPherson