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

MAR 13 2008

Mr. Danny Glaser
[redacted]

Dear Mr. Glaser:

This responds to your letter dated November 5, 2007, requesting an interpretation of subparagraph 61.65(d)(2)(iii)(C), Title 14, Code of Federal Regulations, as it pertains to different kinds of approaches, *i.e.* three different kinds of navigation systems, required during a cross-country flight for an instrument rating. You specifically inquire if an Airport Surveillance Radar (ASR) or a Precision Approach Radar (PAR) can be used as one of the three required approaches. The issue is whether either ASR or PAR can classify as a type of approach required to satisfy the requirements of a cross-country flight for an instrument rating.

Set forth below is pertinent part of the regulation.

> §61.65(d)(2)
>
> (iii)For an instrument airplane rating, instrument training on cross-country flight procedures specific to airplanes that includes at least one cross-country flight in an airplane that is performed under IFR, and consists of—(C) Three different kinds of approaches with the use of navigation systems;

As shown above, subparagraph 61.65(d)(2)(iii)(C) clearly states that to satisfy the requirements of a cross-country flight for an instrument rating a pilot must use three different kinds of *navigation* systems (emphasis added). Under the April 4, 1997, final rule for Part 61, the FAA consciously did not specify the kinds of navigation systems a pilot must perform in order to comply with the above subparagraph; hence a pilot may choose any three of the following navigation systems:

Non-directional beacon (NDB)
Localizer-type directional aid (LDA)
Very high frequency omni-range station (VOR)
Global Positioning System (GPS)
Simplified Direction Facility (SDF)
Instrument landing system localizer (LOC)

ASR and PAR are not on the above list because they do not qualify as navigation systems. Rather, they are radar tracking systems. ASR and PAR are ground controlled approaches in which air traffic control personnel transmits instructions to the pilot by radio.

They do not require flight crew to direct an aircraft on its course, but rather to listen and comply with a ground controller's instructions. Moreover, both ASR and PAR are rarely performed today. ASR is usually approved only when necessary for an Air Traffic Control operational requirement or in emergency situations. PAR is used almost exclusively in a military setting. Given the above analysis, the answer is you cannot use either ASR or PAR to satisfy the requirements of subparagraph 61.65(d)(2)(iii)(C).

This response was prepared by Adrianne Wojcik, an Attorney in the Regulations Division of the Office of the Chief Counsel, and has been coordinated with the Office of Flight Standards. If you have additional questions regarding the matter, please contact us at your convenience at (202)267-7776.

Sincerely,

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