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

Office of the Chief Counsel

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

DEC 18 2008

Mr. Michael Griffith
[redacted]

Dear Mr. Griffith,

This responds to your letter dated August 14, 2008, requesting an interpretation of Title 14, Code of Federal Regulations, as it pertains to logbook endorsements for meeting recent flight experience requirements under § 61.57 when a pilot fulfills such requirements by using an approved flight training device (FTD). You specifically ask what logbook endorsements can be given when an approved FTD is used, and who may endorse a pilot's logbook for passing the instrument proficiency check if the training takes place in an approved FTD.

Set forth below are pertinent parts of the regulations:

> § 61.57(c) *Instrument experience*. Except as provided in paragraph (e) of this section, no person may act as pilot in command...unless within the preceding 6 calendar months, that person has:
> (1)...performed and logged under actual or simulated instrument conditions, either in flight in the appropriate category of aircraft for the instrument privileges sought or in a flight simulator or a flight training device that is representative of the aircraft category for the instrument privilege sought—
>
> § 61.57(d) *Instrument Proficiency check*....
> (1) The instrument proficiency check must be—
> (ii) For other than a glider, in a flight simulator or a flight training device that is representative of the aircraft category;...
> (2) The instrument proficiency check must be given by—
> (i) An examiner;
> (ii) A person authorized by the U.S. Armed Forces to conduct instrument flight tests, provided the person being tested is a member of the U.S. Armed Forces;
> (iii) A company check pilot who is authorized to conduct instrument flight tests under part 121, 125, or 135 of this chapter or subpart K of part 91 of this chapter...;
> (iv) An authorized instructor; or
> (v) A person approved by the Administrator to conduct instrument practical tests.

To answer your first question about what logbook endorsements can be given when an approved FTD is used, both §§ 61.57(c)(1) and 61.57(d)(1)(ii) explicitly state that approved FTDs may be used to meet the recent flight experience requirements, as long as a given FTD is approved for such training and proficiency check. Generally, all appropriate endorsements for passing the instrument proficiency check, which would be otherwise given if the check were passed in an aircraft, can also be given when one passes the check by using an FTD, as long as the FTD represents the appropriate aircraft category for the instrument privileges sought. You can find more information about approved training devices in the FAA's Advisory Circular 61-136, published on 07/14/08.

With regards to your second question of who can endorse a pilot's logbook for passing a proficiency check, § 61.57(d)(2)(iv) requires the endorsement from an "authorized instructor". Although the category of "authorized instructor" identified in § 61.57(d)(2) includes various instructors, such as a part 142 training center instructor, an Instrument Ground Instructor (IGI) is not an "authorized instructor" who can endorse for the instrument proficiency check required by § 61.57(d). The flight proficiency check contains a flight portion and hence requires an authorized flight instructor.

Moreover, § 61.193(a) states that a CFI is authorized to give appropriate endorsements that "relate to" an instrument rating only "within the limitations of that person's flight instructor certificate". Therefore, only a certified instrument flight instructor (CFII), who holds an instrument rating on his or her flight instructor certificate, which is appropriate to the category and class of the aircraft for which the instrument proficiency check is being conducted in, is authorized to endorse for passing that instrument proficiency check.

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