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

Office of the Chief Counsel

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

MAR 11 2009

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

Dear Mr. Johnson:

This is in response to your November 4, 2008, request for information regarding appropriate procedures for documenting "other commercial flying" as addressed in Information for Operators (InFO) 08015, dated March 21, 2008.

As noted in the InFO, time spent conducting other commercial flying must be included in a flight crewmember's total flight time to determine whether he or she has exceeded the flight time limitations established in parts 121 and 135. The InFO advised the directors of safety and operation to ensure that their manuals provided instruction and information to their flight crewmembers regarding reporting other commercial flying, and that a process was in place to ensure that other commercial flying time is recorded in the air carrier's records. You question whether documenting other commercial flight time, as recorded by a pilot in his or her logbook, in the air carrier's records, is an appropriate means to address this issue. The FAA has determined that this is one appropriate method for monitoring a flight crewmember's other commercial flying time.

We appreciate your patience and trust that the above responds to your concerns. If you need further assistance, please contact my staff at (202) 267-3073. This response was prepared by Anne Bechdolt, Acting Manager of the Operations Law Branch of the Regulations Division of the Office of the Chief Counsel, and coordinated with the Air Transportation Division of Flight Standards Service.

Sincerely,

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