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

Office of the Chief Counsel

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

JAN 14 2010

Gordon Cox
[redacted]

Dear Mr. Cox:

This letter responds to the request for a legal interpretation that you sent to this office on September 7, 2009. Specifically, you have asked whether 14 CFR 141, appendix I contains a curriculum requirement for solo flight time in an FAA approved course for an additional category or class rating. The answer is no.

Appendix I prescribes the minimum curriculum for an additional aircraft category rating course or an additional aircraft class rating course. On August 21, 2009, the FAA published the Pilot, Flight Instructor, and Pilot School Certification Final Rule, which contained significant revisions to appendix I. 74 FR 42500, 42566. In that final rule, which became effective on October 21, 2009, the FAA provided a more detailed list of the minimum curriculum, including flight training requirements, for an additional aircraft category rating course and an additional aircraft class rating course. As revised, appendix I does not contain any solo flight time requirements.

We note that, in order to be eligible for a training course under appendix I, a person must hold the level of pilot certificate for the additional category or class rating for which the course applies. As such, the pilot already would have met the requirements for that level of certificate including the required solo flight time. Although appendix I makes reference to appendices A (Recreational Pilot Certification Course), B (Private Pilot Certification Course), and D (Commercial Pilot Certification Course), those references merely require that training courses under appendix I include flight training on the areas of operation listed in those appendices as appropriate to the category and class ratings sought. Appendix I does not, as you suggest, require that a training course include the solo flight time requirements contained in appendices A, B, or D.

This response was prepared by Anne Moore, an Attorney in the Regulations Division of the Office of the Chief Counsel and coordinated with the Certification and General Aviation Operations Branch of Flight Standards Service. We hope this response has been helpful to you. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

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