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

Office of the Chief Counsel

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

SEP 24 2010

Mr. Stephen Gatlin
[redacted]

Dear Mr. Gatlin:

This is in response to your inquiry concerning whether an Advanced Ground Instructor or Instrument Ground Instructor is an "Authorized Instructor," as defined in 14 C.F.R. §61.1(b)(2), for purposes of giving instrument instruction to candidates for Private Pilot, Instrument Pilot, and Commercial Pilot certificates in a flight simulator, flight training device or advanced aviation training device.

In your letter you base your interpretation of which types of training are permissible for a Advanced Ground Instructor/Instrument Ground Instructor on the definition of an "Authorized Instructor" under 14 C.F.R. §61.1(b)(2). This section states that,

> "*Authorized Instructor* means (i) A person who holds a ground instructor certificate issued under Part 61 of this chapter and is in compliance with §61.217, when conducting ground training in accordance with the privileges and limitations of his or her ground instructor certificate.
> (ii) A person who holds a flight instructor certificate issued under Part 61 of this chapter and is in compliance with §61.217, when conducting ground training or flight training in accordance with the privileges and limitations of his or her flight instructor certificate."

In addition, the definition of ground training, in §61.1(b)(8) is as follows, "*Ground training* means that training, other than flight training, received from an authorized instructor." (italics in original)

The privileges of a ground instructor are specifically listed in §61.215(b), which states that, "a person who holds an advanced ground instructor rating is authorized to provide: (1) ground training on the aeronautical knowledge areas required for the issuance of any certificate or rating under this part." Section 61.215(c) likewise states that "a person who holds an instrument ground instructor rating is authorized to provide: (1) Ground training in the aeronautical knowledge areas required for the issuance of an instrument rating under this part."

Section 61.215 – Ground Instructor Privileges, is silent regarding whether the privileges of a ground instructor permit supervision of training in a flight simulator or flight training device. As this section is an exhaustive listing of the privileges granted to persons holding ground instructor certificates, the omission of any grant of authority allowing ground instructors to supervise flight training time in a flight simulator or flight training device is evidence that ground instructors are not authorized instructors for purposes of conducting flight training in flight simulators or flight training devices. Therefore, the interpretation of the regulations by the FAA designee is correct, and you would not be permitted to supervise flight training for purposes of logging time toward an instrument rating or pilot certificate.

We trust that the above response addresses your concerns. If you need further assistance, please contact my staff at (202) 267-3073. This response was prepared by Neal O'Hara, an Attorney in the Regulations Division of the Office of the Chief Counsel, and was coordinated with the Certification and General Aviation Operations Branch of the Flight Standards Service.

Sincerely,

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