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

Office of the Chief Counsel

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

MAR 30 2011

Mr. Greg Frick
[redacted]

Dear Mr. Frick:

This is in response to your inquiry requesting further clarification of our interpretation of 14 C.F.R. §61.1(b)(2) definition of Authorized Instructor, issued on September 24, 2010.

You asked whether a ground instructor may use a flight simulator, flight training device or aviation training device as a tool or aid in providing ground training, provided that none of the training is logged, endorsed or credited toward the completion of aeronautical experience required for a pilot certificate or rating. The answer to your question is yes, a ground instructor may use these methods as tools, or aids to instruction, but the time cannot be counted towards meeting the aeronautical experience requirements for a pilot certificate or rating.

You also ask whether a ground instructor can provide "proficiency" ground training to pilots who have already received their appropriate pilot certificate or rating. I believe what you are asking is whether a ground instructor can give training in a flight simulator, flight training device or aviation training device to assist a pilot in maintaining proficiency in the skills necessary to maintain such rating or certificate. Once again, as long as the time is not logged, endorsed or credited towards recency experience for maintaining such rating, this is permissible. However, pilots should be aware that any such training supervised by a ground instructor will not count towards satisfying recency or proficiency experience for maintaining that rating.

Thirdly, you ask the same question in another way. For the purposes of meeting pilot instrument recency of experience requirements in a flight simulator, flight training device or aviation training device, is a ground instructor considered an authorized instructor to observe and endorse that time. I believe that question was answered quite clearly in the interpretation letter to Mr. Stephen Gatlin (September 24, 2010); the answer is no.

We hope this response has been helpful. If you have any additional questions, please do not hesitate to 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