U.S. Department
of Transportation
Federal Aviation
Administration

Office of the Chief Counsel

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

MAY - 9 2011

Mitchell Gossman
[redacted]

Dear Mr. Gossman:

This is in response to your letter dated January 5, 2011, requesting an interpretation on whether guidance in the Aeronautical Information Manual ("AIM") conflicts with 14 C.F.R. 91.126(b)(1).

Section 91.126(b)(1) states:

(b) *Direction of turns.* When approaching to land at an airport without an operating control tower in Class G airspace—

(1) Each pilot of an airplane must make all turns of that airplane to the left unless the airport displays approved light signals or visual markings indicating that turns should be made to the right, in which case the pilot must make all turns to the right . . . .

In your letter, you state that the AIM section 4-3-3, as well as many other sources, describes the safest method for pattern entry as using a 45-degree entry to the downwind, meaning a turn to the right to enter a left traffic pattern. The AIM provides a diagram depicting this recommendation. You state that this recommendation would put a pilot in technical violation of section 91.126(b)(1). We disagree.

Section 91.126(b)(1) applies to pilots approaching to land at an airport without a control tower and is designed to promote predictable aircraft maneuvers, traffic flows and patterns in Class G uncontrolled airspace. The AIM, while not regulatory, consists of recommended procedures to assist pilots in executing their responsibilities as required by the regulations. Section 91.126(b)(1) does not prohibit a 45-degree right turn from the entry leg onto the downwind leg because we have long considered that this rule does not prohibit maneuvers necessary to safely enter the flow of traffic at the airport. The regulation itself contemplates that right turns may be necessary or required: ". . . in which case the pilot must make all turns to the right . . . ." 14 C.F.R. 91.126(b)(1).

In accordance with this legal opinion, Advisory Circular 90-66A states that arriving aircraft should enter the downwind leg at a 45-degree angle abeam the midpoint of the runway. See Advisory Circular 90-66A (Aug. 26, 1993) (preceded by Advisory Circular 90-66 (Feb. 27, 1975), which included the recommendation to make a 45-degree angle to the downwind leg abeam the midpoint of the runway to enter the standard traffic pattern). The identical

guidance in the AIM section 4-3-3 is a recommended maneuver to safely enter the flow of traffic and does not contradict 14 C.F.R. 91.126(b)(1).

I hope this information has been helpful. This interpretation has been coordinated with Flight Standards Service—General Aviation and Commercial Division. If you have further questions concerning this interpretation, please contact Sabrina Jawed on my staff at 202-267-3073.

Sincerely,

Michael Chase

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