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

Office of the Chief Counsel

Office of the Chief Counsel
800 Independence Ave., SW.
Washington, DC 20591

OCT 17 2012

Mr. Wesley Beard
[redacted]

Dear Mr. Beard:

This is in response to your request for interpretation of 14 C.F.R. §61.195 Flight Instructor Limitations and Qualifications, specifically whether a pilot who holds a flight instructor certificate with an instrument rating but no aircraft category and class ratings can give instrument instruction to instrument, commercial and ATP applicants in a flight simulator or flight training device.

It has been the FAA's consistent interpretation of §61.195(b) and (c) that, in order to conduct instrument flight training in an aircraft, a flight instructor must hold on his or her flight instructor certificate (1) aircraft category and class ratings for the aircraft in which the training is conducted, and (2) an instrument rating appropriate to the category of aircraft. Interpretation to Taylor Grayson, January 4, 2010. As § 61.195 was originally written before the rules permitted flight simulators and flight training devices to be used for training, it does not mention conducting instrument flight training in those devices. However, the FAA has interpreted the instructor requirements under this section to apply to instruction in flight simulators and flight training devices, as well, since these devices are designed to replicate flight by category and class of aircraft. The FAA will examine §61.195 to determine whether we need to clarify the regulation.

We hope this response is helpful to you. If you have additional questions regarding this matter, please contact my staff at (202) 267-3073. This response was prepared by Neal O'Hara, an attorney in the International Law, Legislation and Regulations Division of the Office of the Chief Counsel, and was coordinated with the General Aviation and Commercial Division of the Flight Standards Service.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel for International Law,
Legislation and Regulations Division, AGC-200