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

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

JUL 1 0 2012

Kristian Kortokrax
[redacted]

Dear Mr. Kortokrax:

This is in response to your request for interpretation of 14 C.F.R. 61.195(b)(1) and (c), and clarification of the Grayson interpretation letter of July 6, 2010.

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.

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 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 Regulations, AGC-200