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

Office of the Chief Counsel

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

DEC 13 2012

Fihmi Rossman
[redacted]

Dear Mr. Rossman:

This letter responds to your request for legal interpretation that you mailed to my office on August 2, 2012. You have asked how a pilot seeking a commercial pilot certificate with an airplane category multiengine class rating may credit flight time in a flight training device (FTD) that represents a single-engine airplane. For the purpose of this interpretation, we assume the pilot is seeking an initial commercial pilot certificate and rating.

Section 61.129(i)(1)(i) permits a pilot who completes training outside of a part 142 training center to credit a maximum of 50 hours in a flight simulator or flight training device toward the total aeronautical experience requirements for an airplane rating if the aeronautical experience was obtained from an authorized instructor in a flight simulator or flight training device that represents the class of airplane appropriate to the rating sought. Because you are applying for a commercial pilot certificate with an airplane category multiengine class rating, the 40 hours of aeronautical experience that you obtained in a flight training device that represents a single-engine airplane cannot be credited toward the 250 hours of total flight time.

This response was prepared by Anne Moore, an attorney in the International Law, Legislation, and Regulations Division of the Office of the Chief Counsel, and has been coordinated with the Airman Certification and Training Branch of Flight Standards Service. If you have any additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

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