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

Office of the Chief Counsel

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

JUN 19 2012

Kolin Zomnir
[redacted]

Dear Mr. Zomnir,

This is in response to your email dated March 5, 2012, requesting an interpretation on 14 C.F.R. 61.63(b)(1). Specifically, you ask whether the "aeronautical experience" referred to in section 61.63(b)(1) requires a student interested in a private pilot rotorcraft/helicopter license to be proficient in the aircraft and its operations, or whether the student must also meet the aeronautical experience requirements set out in 14 C.F.R. 61.109(c).

Section 61.63(b)(1) requires that for an additional aircraft category rating on a pilot certificate, other than for an airline transport pilot certificate, a person must "complete the training and have the applicable aeronautical experience."

In your letter, you state that you are a rotorcraft/helicopter flight school and you have a student beginning his training. You further state that this student has multiple fixed wing ratings, and is interested in obtaining his private pilot certificate with rotorcraft category helicopter class rating.

First, you ask whether your student is required to be proficient to the practical test standards to pass a practical exam. The answer is yes. Section 61.39 lists the prerequisites for practical tests. Section 61.39(a)(6) states that to be eligible for a practical test for a certificate or rating under part 61, an applicant must have the required endorsements certifying that the applicant, among other things, (i) has received and logged training time within 2 calendar months preceding the month of application in preparation for the practical test, and (ii) is prepared for the required practical test. In addition, section 61.103 lists general eligibility requirements for a private pilot certificate. Section 61.103(f)(2) requires that an applicant receive flight training and a logbook endorsement from an authorized instructor who certified that the person is prepared for the required practical test. In addition, section 61.39(a)(6)(ii) states that to be eligible for a practical test for a rating under part 61 an applicant must have an endorsement signed by an authorized instructor who certified that the applicant is prepared for the required practical test.

You also ask whether your student must meet the requirements of 14 C.F.R. 61.109(c) to take the practical exam. The answer is yes. The aeronautical experience mentioned in section 61.63(b) refers to the training and flight time requirements listed in section

61.109. To qualify for the rotorcraft category with helicopter class rating, your student must satisfy all the requirements of section 61.109(c), including three hours of flight training with an authorized instructor in a helicopter in preparation for the practical test. Section 61.103(g) requires the applicant to meet the aeronautical experience requirements of part 61 that apply to the aircraft rating sought before applying for the practical test. The practical test must be conducted in accordance with the PTS and meet those standards to satisfy the requirements of the test. All of these requirements must be satisfied to add a new category to an existing certificate.

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

Sincerely,



Rebecca MacPherson
Assistant Chief Counsel for Regulations, AGC-200