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

Office of the Chief Counsel

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

FEB 22 2013

Donald Harrington
American Flyers
3N040 Powis Road
West Chicago, IL 60185

Dear Mr. Harrington:

This letter responds to your request for legal interpretation dated October 15, 2012. Specifically, you have asked for clarification regarding the minimum course hour requirements for a Flight Instructor Refresher Course (FIRC).

Section 61.197 permits a flight instructor to renew his or her instructor certificate by submitting an application and satisfactorily completing "an approved flight instructor refresher course consisting of ground training or flight training, or a combination of both." Appendix K of part 141 states that a FIRC "must include a combined total of 16 hours of aeronautical knowledge training, flight training, or any combination of ground and flight training[.]" Current FAA guidance indicates that a FIRC curriculum submitted to the FAA for approval "must consist of no fewer than 16 hours of ground and/or flight instruction." Advisory Circular 61-83G. Although there is no stated regulatory minimum in §61.197, the FAA has consistently indicated that the standard for receiving FAA approval of a FIRC curriculum is 16 hours. The FAA believes that it is necessary to maintain a level of standardization in FIRC curricula and has emphasized the coverage of program areas essential to enhance the knowledge, skills, and instructional capability of flight instructors. Advisory Circular 61-83G.

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,

Mark W. Bury
Acting Assistant Chief Counsel for International Law,
Legislation, and Regulations Division, AGC-200