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

NOV -1 2013

Mr. David Lanfor
[redacted]

Dear Mr. Lanfor:

This is in response to your letter requesting a legal interpretation of 14 C.F.R. §§ 61.211, 61.213 and 61.215 concerning the requirements for issue of Ground Instructor Certificates. You state that you hold a commercial pilot certificate with an instrument airplane rating and a flight instructor certificate (CFI) for airplane single engine land.

In your first question concerning eligibility for a ground instructor certificate, you state that you believe you meet the requirements of § 61.213(a)(3) since you currently hold a flight instructor certificate. This is correct. Section 61.213(a)(3) requires an applicant for a ground instructor certificate or rating to pass a knowledge test on the fundamentals of instructing. Because an applicant who holds a flight instructor certificate or ground instructor certificate has already satisfied this requirement, § 61.213(b) provides a basis for an applicant to opt out of completing the knowledge test required by § 61.213(a)(3).[1]

In your second question concerning eligibility for an instrument ground instructor certificate, you quote from § 61.213(a)(4)(iii), "Pass a knowledge test on the aeronautical knowledge areas in- For an instrument ground instructor rating, § 61.65." Since you hold an instrument rating, you contend that you satisfy this requirement and should be issued an instrument ground instructor certificate.

To demonstrate compliance with § 61.213(a)(4)(iii), an applicant must pass the FAA Instrument Ground Instructor (IGI) test to be eligible for an Instrument Ground Instructor Certificate.[2] While this paragraph indicates that the aeronautical areas that an applicant can

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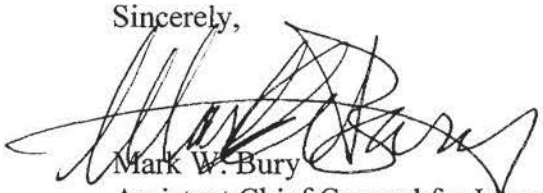
[1] To be eligible for a flight instructor certificate or rating, a person must pass a knowledge test on the fundamentals of instructing unless he or she already holds a flight instructor or ground instructor certificate issued under part 61, holds a teacher's certificate issued by a State, county, city or municipality that authorizes persons to teach at an educational level of the 7th grade or higher, or is employed as a teacher at an accredited college or university. 14 C.F.R. § 61.183(e).

[2] Section 61.13(a) Issuance of Airman Certificates, Ratings and Authorizations, states that, "An applicant for an airman certificate, rating or authorization under this part must make that application on a form and in a manner acceptable to the Administrator." The FAA's policy setting forth that form and manner in the case of ground instructor certificates is contained in FAA Order 8900.1 (http://fsims.faa.gov/), Volume 5, Chapter 2, Section 17. Paragraph 5-679 E, which provides Table 5-2 Knowledge Test Required for Ground

be expected to be tested on include areas under § 61.65, there is a specific test for instrument ground instructors and the fact that a pilot was previously tested on these areas for his or her pilot certificate's instrument rating cannot count towards the ground instructor certificate. There is no regulatory basis for opting out of the knowledge required by § 61.213(a)(4)(iii) as there is for the § 61.213(a)(3) knowledge test.

We hope this response has been helpful to you. If you have additional questions, 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,



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

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Instructor Certificate or Added Rating. This table shows that the IGI test is required for the issuance of an Instrument Ground Instructor certificate.