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

DEC 23 2013

Mr. Bryce Richards
[redacted]

Dear Mr. Richards:

This is in response to your request for interpretation concerning the logging of Pilot-In-Command (PIC) time under 14 C.F.R. § 61.51(e) for flights conducted in a high-performance or complex airplane.

Your inquiry involves a scenario where Pilot 1, holding a private pilot certificate with an airplane single-engine land rating, but no endorsements for complex or high-performance airplanes as required by 14 C.F.R. §§ 61.31(e)-(f) to act as PIC, is flying in a complex or high-performance airplane. The other pilot, Pilot 2, who does hold the proper certificate and ratings, is acting as PIC for the flight. You ask whether Pilot 1, who does not hold the proper endorsements may still log PIC time for the time he is sole manipulator of the controls and whether any time such pilot might spend flying in simulated instrument conditions, may be credited as instrument time in his logbook.

In response to your inquiry, I refer you to the Legal Interpretation to John Speranza, December 4, 2009, and the Legal Interpretation to Jason Herman, May 21, 2009, both of which deal with the question of logging PIC time when a pilot is sole manipulator of the controls of an aircraft. Copies of both interpretations are enclosed. As explained more fully in those interpretations, although the endorsements requirement of Sections 61.13(e) and (f) must be met to act as PIC of a high-performance or complex airplane, those endorsements are not required to log PIC time if the pilot is rated for and is the sole manipulator of the controls of the aircraft.

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 Office of the Chief Counsel, and was coordinated with the Commercial and General Aviation Division of the Flight Standards Service.

Sincerely,

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

Enclosures (2)