U.S. Department
of Transportation
Federal Aviation
Administration

Office of the Chief Counsel

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

OCT 10 2014

Mr. Andrzej Stewart
[redacted]

Dear Mr. Stewart:

This letter is in response to your inquiry regarding the use of flight simulators in maintaining instrument currency under 14 C.F.R. §61.57(c), and whether a flight instructor is required to be present when conducting instrument currency training in a flight simulator, flight training device or aviation training device.

You have asked whether a flight instructor is required to be present when a pilot is maintaining instrument currency in a flight simulator, flight training device or aviation training device. Title 14 Code of Federal Regulations § 61.51(g)(4) allows a person to use time in a flight simulator, flight training device or aviation training device for acquiring instrument aeronautical experience for a pilot certificate, rating, or instrument recency experience, "provided an authorized instructor is present to observe that time and signs the person's logbook or training record to verify the time and the content of the training session." This question was answered extensively in a letter of interpretation to Mr. Terrence Keller (August 6, 2010). I have enclosed a copy of that letter for your information.

The aviation training device you asked about, a Precision Flight Controls Modular Flight Deck Advanced Aviation Training Device (AATD) is qualified and approved by the FAA as an aviation training device. If a pilot accomplishes instrument experience exclusively in an ATD, then § 61.57(c)(3) requires that, within the preceding two months, the pilot must have performed the instrument tasks and maneuvers listed in that section.

We hope this response has been helpful to you. If you have any additional questions or further information, 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

Enclosure