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

Office of the Chief Counsel

800 Independence Ave., SW.
Washington, DC 20591

AUG 2 8 2015

Dan Moerke
Chief Flight Instructor
South Dakota State University Aviation Program
201 W. 2nd St. S.
Brookings, SD 57006

Re: Request for Interpretation Regarding the Transfer of Flight Time Credit Between Part 141 Pilot Schools

Dear Mr. Moerke:

This letter responds to your March 21, 2015 request for a legal interpretation regarding the transfer of flight time credit between pilot schools certificated under 14 Code of Federal Regulations (CFR) part 141.

In your letter you stated that South Dakota State University (SDSU) operates a part 141 pilot school, using a professional pilot curriculum based on § 141.57, Special curricula, in which students enrolled in the course will attain their certificates and ratings from private pilot Airplane Single Engine Land (ASEL) through commercial pilot ASEL and Airplane Multi-Engine Land (AMEL) in 190 flight hours. SDSU receives transfer students from other part 141 pilot schools on a fairly regular basis.

Your question is how much flight time may SDSU credit students when they transfer into SDSU's part 141 special curricula pilot school training program from another part 141 pilot school program. The answer is that no more than 50 percent of flight time necessary to complete SDSU's curriculum may be credited to the transfer student.[1]

Section 141.77(c) states in pertinent part that:

> A student may be given credit towards the curriculum requirements of a course for previous training under the following conditions: (1) If the student completed a proficiency test and knowledge test that was conducted by the receiving pilot school and the previous training was based on a part 141 or a part 142 approved flight training

[1] The FAA notes that SDSU holds a Letter of Authorization (LOA) that authorizes SDSU to certify its graduates for an Airline Transport Pilot (ATP) certificate with reduced aeronautical experience. The LOA contains additional conditions that must be met in order for any credit, received under § 141.77, to be used to meet the requirements of § 61.160.

course, the credit is limited to not more than 50 percent of the flight training requirements of the curriculum.

Therefore, SDSU may credit the student with up to 50 percent of the flight hours necessary for completion of the curriculum at SDSU provided that student completed at least that many hours at a previous part 141 school and SDSU completes a proficiency and knowledge test. For example, a student that completed 80 hours of flight training at a previous part 141 school that then transfers to SDSU may be credited with up to 60 hours, or 50 percent of the minimum hours necessary to complete the SDSU curriculum (120 hours). The credit amount for previous training at a part 141 school is determined by an evaluation of the student and subject to the student's performance during the proficiency and knowledge test.

This response was prepared by Benjamin Borelli, an attorney in the Regulations Division of the Office of the Chief Counsel, and was coordinated with the Airman Certification and Training Branch (AFS-810). If you need further assistance, please contact our office at (202) 267-3073.

Sincerely,

Lorelei Peter
Acting Assistant Chief Counsel for Regulations