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

Office of the Chief Counsel

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

FEB 13 2015

Norman W. Robinson
[redacted]

Re: Pilot-in-command flight time requirement for a glider category rating at the commercial pilot certificate level

Dear Mr. Robinson:

This letter responds to your request for legal interpretation mailed to my office on October 14, 2014. You state that you hold an airline transport pilot certificate with ratings in the airplane and rotorcraft categories and have completed over 20,000 hours of flight time. You have asked for clarification on how to accomplish pilot-in-command (PIC) time in gliders to meet the aeronautical experience requirements for a glider category rating at the commercial pilot certificate level. Because you do not hold the appropriate ratings to act as pilot in command, you must obtain a solo endorsement under 14 C.F.R. § 61.31(d) to complete the pilot in command flight time requirements.

A person who adds a category rating to a pilot certificate must complete the aeronautical experience requirements for the category of aircraft. 14 C.F.R. § 61.63(b)(1). Based on your experience in heavier-than-air aircraft, to be eligible for a glider category rating at the commercial pilot level, you must, among other things, complete "at least 20 flights in a glider as pilot in command."[1] 14 C.F.R. § 61.129(f)(2).[2]

Generally, a person must hold the appropriate category, class, and type ratings to act as pilot in command of an aircraft. 14 C.F.R. § 1.1. The regulations, however, permit a person who does not hold category, class, and type ratings to act as PIC with a solo endorsement from an authorized instructor. 14 C.F.R. § 61.31(d). To receive that endorsement, a pilot must have received the training required under part 61 "appropriate to the pilot certification level,

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[1] We note that the aeronautical experience requirement pertaining to pilot in command for gliders is phrased different from the language for other categories of aircraft." For a glider rating the language requires an applicant to complete flights "as pilot in command," whereas, for airplane and helicopter ratings, the regulations require an applicant to complete "pilot in command flight time. Whether the applicant for a glider rating must act as PIC or merely log PIC flight time, the outcome is the same. The only way to act as PIC without the appropriate ratings is to complete solo flight time under a § 61.31(d) endorsement. Likewise, the only way to log PIC flight time without holding the appropriate ratings is as the sole occupant of the aircraft which also requires a solo endorsement under § 61.31(d).

[2] Within the total flight time requirement, an applicant must also complete flight training and solo flight requirements.

aircraft category, class, and type rating (if a class or type rating is required) for the aircraft to be flown." 14 C.F.R. § 61.31(d)(2). Accordingly, you must receive a solo endorsement under § 61.31(d) to complete the pilot in command requirements for a glider category rating at the commercial pilot level.

This response was prepared by Anne Moore, an attorney in the Regulations Division of the Office of the Chief Counsel. If you have any additional questions regarding this matter, please contact my office at (202) 267-3073.

Sincerely,

Mark W. Bury
Assistant Chief Counsel for Regulations