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

Office of the Chief Counsel

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

JUL 30 2015

Mr. Thomas M. Thorpe
Director of Compliance
FlyRight Holdings, Inc.
7275 Westwinds Blvd., NW
Concord, NC 28027

RE: 14 C.F.R. part 142 Record Keeping Requirements

Dear Mr. Thorpe:

This is in response to your inquiry as to whether FlyRight Holdings, a part 142 simulator training center, is required to keep records maintained by its flight instructors under 14 C.F.R. § 61.189, in addition to recordkeeping requirements under 14 C.F.R. § 142.73.

Section 61.189 applies to the individual certificated flight instructor (CFI) and specifies the responsibilities to maintain records of the names of each person whose logbook or student pilot certificate that instructor has endorsed for solo flight privileges, knowledge tests and practical tests.

Section 142.73 requires a training center to maintain a record for each trainee, and each instructor or evaluator designated to instruct a course. Section 142.73(c) specifies all the responsibilities of the certificate holder in maintaining these records and making them available to the Administrator for inspection.

These requirements in part 61 and part 142 are separate. Under § 61.189 each certificated flight instructor must maintain his or her own personal records of endorsements and instruction given to student pilots, but that section does not require a part 142 certificate holder that employs that flight instructor to maintain those records as well. Rather, a part 142 training center must maintain records consistent with the requirements in § 142.73.

We hope this response proves helpful to you. If you have additional questions or need further assistance, please do not hesitate to contact my staff at (202) 267-3073. This response was prepared by Neal O'Hara, an attorney in the Office of the Chief Counsel, Regulations Division, and was coordinated with the Air Transportation Division of the Flight Standards Service.

Sincerely,

Lorelei Peter
Acting Assistant Chief Counsel for Regulations, AGC-200