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

Office of the Chief Counsel

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

SEP 2 6 2016

Jim Dent
310 SW 120 Terr
Plantation, FL 33325

Re: Support Pilot Qualifications

Dear Mr. Dent:

This letter responds to your April 29, 2016 request for interpretation of the qualifications of a support pilot. In your letter, you ask the following questions:

1) On a multi-engine turbo-jet simulator can a Part 135 (§§135.293, 135.297) checkride be conducted with a support pilot who is not a pilot that is qualified under Part 135 with the certificate holder?
2) Can training be conducted utilizing a support pilot that is not a Part 135 current pilot with the air carrier?

I presume your use of the term "support pilot" refers to a person who is acting as pilot monitoring (either pilot in command or second in command) during air carrier simulator training or checking. It is noted that "support pilot" could also refer to a person performing the role of pilot flying so that another pilot may be trained to perform the duties of pilot monitoring.

Although FAA's regulations do not address specific requirements for a support pilot, the FAA does address crew pairing for simulator checking and training in Order 8900.1 at paragraph 3-4414F. An air carrier's approved training program should additionally outline seat support protocols, especially for use with a contract training provider. For further information about these policies, please contact the Air Transportation Division (AFS-200) of the Flight Standards Service.

We appreciate your patience and trust that the above responds to your inquiry. If you need further assistance, please contact my staff at (202) 267-3073. This response was prepared by Courtney Freeman, an attorney in the Regulations Division of the Office of the Chief Counsel, and coordinated with the Air Transportation Division of the Flight Standards Service.

Sincerely,

Lorelei Peter
Assistant Chief Counsel for Regulations

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800 Independence Ave., S.W.
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Jim Dent
310 SW 120 Terr
Plantation Fl 33325

To Whom It May Concern,

My question is regarding a Part 135.293/297 check ride. On a multi-engine turbo-jet simulator can a Part 135 checkride be conducted with a support pilot who is NOT a pilot that is qualified under Part 135 with the certificate holder?

Additionally can training be conducted utilizing a support pilot that is NOT a Part 135 current pilot with the air carrier.

Respectfully Yours,

Jim Dent