NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.517

National Policy

Effective Date:
7/8/19

Cancellation Date:
7/8/20

SUBJ: Regulatory Requirement to Provide Enough Flight Instructors and Check Pilots/Check Flight Engineers

1. Purpose of This Notice. This notice provides guidance to Principal Operations Inspectors (POI) with oversight responsibilities for Title 14 of the Code of Federal Regulations (14 CFR) part 119 certificate holders conducting 14 CFR part 121 and/or part 135 operations on the regulatory requirements for flight instructors and check pilots/check Flight Engineers (FE). This notice extends the applicability of Notice N 8900.459, Regulatory Requirement to Provide Enough Flight Instructors and Check Pilots/Check Flight Engineers, which expired on April 4, 2019.

2. Audience. The primary audience for this notice is the Flight Standards Safety Assurance office aviation safety inspectors (ASI) having oversight of part 121 and certain part 135 certificate holders. The secondary audience includes the Safety Standards and Foundational Business offices.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avs.faa.gov. Operators can find this notice on the Federal Aviation Administration's (FAA) website at http://fsims.faa.gov. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. Part 119 certificate holders conducting part 121 and/or part 135 operations are required to provide flight instructors and check pilots/check FEs to support their operational infrastructure. In some cases, certificate holders have not established sufficient numbers of check pilots/check FEs to perform required checks and have been dependent on the FAA to conduct the checks. This notice reaffirms the regulatory obligations imposed on certificate holders with training programs, specifically the need to provide enough qualified instructors and check pilots/check FEs to conduct all checks and other associated duties mandated by applicable regulations.

5. Definitions and Regulatory Requirements.

a. Terminology. The FAA is replacing the older term "check airman" in regulations and guidance with "check pilot" and "check Flight Engineer." These terms are synonymous with "check airman."

b. Parts 121 and 135 Regulatory Requirements. Parts 121 and 135 contain the following regulatory requirements, respectively:

§ 121.401, Training Program: General	**§ 135.323, Training Program: General**
(a) Each certificate holder shall: … (4) Provide enough flight instructors, simulator instructors, and approved check airmen to conduct required flight training and flight checks, and simulator training courses permitted under this part.	(a) Each certificate holder required to have a training program under § 135.341 shall: … (4) Provide enough flight instructors, check airmen, and simulator instructors to conduct required flight training and flight checks, and simulator training courses allowed under this subpart.

6. Discussion. All part 121 air carriers and all part 135 air carriers/operators that are required to have a training program under § 135.341 must provide an adequate number of appropriately qualified personnel to conduct all flight training and checking required under the applicable operating part. It is particularly important that air carriers/operators provide enough line check pilots to perform delegated functions so that FAA inspector resources may be appropriately deployed. POIs should make a determination of what constitutes enough check pilots/check FEs after a consideration of factors, including the number of aircraft and pilots to be checked; and the certificate holder's ability to ensure that each of its designated check pilots/check FEs is fully trained and qualified to perform checking functions.

> **Note:** This notice does not create any restriction on inspector observation of training or checking being performed by the certificate holder, at any time, with or without notice. It also does not restrict the FAA from performing checking functions when, in the judgment of the POI, such performance is necessary or advantageous.

a. Performance of Checking Functions at Multiple Carriers. In some cases, it may be possible for an individual to serve as a check pilot for more than one air carrier/operator at the same time. In all cases, the responsibility remains with the air carrier/operator to ensure that individuals it designates are trained, qualified, and sufficiently active to remain current in that air carrier/operator's procedures. For guidance on situations in which a check pilot may conduct checking functions for more than one part 135 air carrier/operator, refer to FAA Order 8900.1, Volume 3, Chapter 20, Section 6, Safety Assurance System: Part 135 Check Pilot Approval and Surveillance, Paragraph 3-20-6-23, Approval of a Check Pilot or for Multiple Operators.

b. Training and Qualification. As a basic requirement of certification, each certificate holder described above must develop and submit for approval curriculum(s) to train and qualify flight instructors and check pilots/check FEs in its particular flightcrew member training and qualification program, in accordance with §§ 135.337 through 135.340 and §§ 121.411 through 121.414. Some certificate holders may elect to contract for these services; however, this does not relieve the certificate holder of its responsibility to adequately describe how these personnel will be trained and qualified. POIs must require certificate holders without such currently approved flight instructor and check pilot/check FE training and qualification curriculum(s) to develop and submit such curriculums.

c. Quantity of Flight Instructors and Check Pilots. In addition, certificate holders must ensure that enough flight instructors are qualified, and enough check pilots/check FEs are trained and nominated, so that all training and checking required under the applicable operating part can be conducted by the certificate holder. Certificate holders should not plan to rely on FAA resources to conduct the required checking activities. Certificate holders may request FAA resources (e.g., for a new aircraft type or new check pilots) but are responsible for maintaining an adequate number of flight instructors and check pilots/check FEs for their planned operations.

7. Disposition. We will incorporate the information in this notice into Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Transportation Division (AFS-200), Air Carrier Training Systems and Voluntary Safety Programs Branch (AFS-280) at 202-267-8166.



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