

FREQUENTLY ASKED QUESTIONS  
14 CFR, PART 61  
ARRANGED BY SECTION

**CHANGE NOTICE**

General Aviation and Commercial Division, AFS-800

John D. Lynch, E-Mail: [john.d.lynch@faa.gov](mailto:john.d.lynch@faa.gov)  
Phone: (202) 267-3844

UPDATE YOUR FAQs at:

Part 61 FAQs at: <http://www.faa.gov/pilots/regs> then click on the subject "Frequently Asked Questions" under Certification: Pilots, Flight Instructors, and Ground Instructors (14 CFR PART 61)

Additional document and linkage for the "Aeronautical Experience Check List" which is a file that contains an aeronautical experience checklist to assist in checking an applicant's FAA Form 8710-1-Airman Certificate and/or Ratings: <http://www.faa.gov/pilots/regs> then click on the subject "Aeronautical Experience Checklist."

The source of answers is from John D. Lynch, Certification Branch, AFS-810, Washington, DC unless otherwise noted.

**The answers in this website address *Frequently Asked Questions on 14 CFR Part 61* and represents FAA Flight Standards Service policy as it relates to this regulation. The answers are in response to questions from FAA Flight Standards Service's Regional Offices, District Offices, and concerned people from the public. The answers reflect FAA Flight Standards Service's policy for the purpose of standardization.**

**QUESTION:** This is an excerpt from the FAR part 61 Q&A

.....I was sent home from a checkride by an examiner due to incomplete endorsements and log book issues. I have a question regarding the log books entries for the flight time required to meet 61.129(b)(4).....

.....Also, is it possible for me to receive any instruction and also "perform the duties of PIC" at the same time? I'm not asking this in order to combine the requirements of § 61.129(b)(3) and § 61.129(b)(4). I have over 34 hours in a multiengine airplane in preparation for this rating. I just want to be sure I understand what needs to happen on flights where I "perform the duties of PIC" to meet the requirements of § 61.129(b)(4). Is being sole manipulator of the controls enough? (With very minor exceptions where I asked the instructor to demonstrate a maneuver, I've been the sole manipulator of the controls on every flight I've taken since my first multiengine airplane lesson). Also, I received a logbook endorsement from my instructor midway through my training wherein he stated that I was qualified to perform the duties of PIC (that is, it's a solo endorsement).

**ANSWER:** Ref. § 61.129(b)(4) and § 61.51(e)(1)(i); An applicant may not log as Pilot-In-Command (PIC) for time acquired while performing the duties of pilot-in-command with an authorized instructor unless the person holds an airplane multiengine land rating on his/her pilot certificate. For logging purposes, the time shall be logged in the AMEL column, conditions of flight column, dual received

column, and total time column. In the remarks column, your flight instructor should record “PIC training per § 61.129(b)(4).”

For example, let’s say the applicant performs a 5 hour cross-country flight with an authorized instructor aboard for the § 61.129(b)(4)(i) requirement. In recording this time (*i.e.*, “. . . performing the duties of pilot in command . . . with an authorized instructor . . .”) in the applicant’s logbook, it would read as follows:

Airplane multiengine land time: 5 hours

Cross-country time: 5 hours

Dual Received time: 5 hours

Total Time: 5 hours

Description of training: PIC training per § 61.129(b)(4).

John Doe, CFI #555555, Exp. 12-31-00

In answer to your question concerning where to record the 10 hours of performing duties of pilot in command on the FAA Form 8710-1, Airman Certificate and/or Rating Application, it is understood that the application doesn’t have a performing duties of pilot in command column. The 10 hours performing the duties as PIC with an instructor on board should be listed in the “Pilot in Command” column of the “Airman Certificate and/or Rating Application” (FAA Form 8710-1).

In answer to your question concerning whether it is possible for you to receive instruction while also "performing the duties of PIC." The intent of this provision in § 61.129(b)(4) [*i.e.*, “. . . performing the duties of pilot in command . . . with an authorized instructor . . .”] is to permit an authorized instructor to be aboard the multiengine airplane and the instructor should only act like an SIC. The instructor should observe, evaluate, and may train the student on performing the duties of pilot in command in a multiengine airplane (*e.g.*, CRM training). The instructor should confine their activities to giving training on “. . . performing the duties of pilot in command . . . on the areas of operation listed in § 61.127(b)(2) . . .” The instructor should put more emphasis on acting like an SIC so the applicant gets the benefit and experience of performing the duties of a pilot in command in crew concept setting (*e.g.* CRM training). The intent of § 61.129(b)(4), in essence, is to provide for the kind of training that is commonly referred to as crew resource management (CRM) training.

For further explanation here is an excerpt of the preamble of the final rule correction document that was issued in the Federal Register (78 FR 20284; Amdt. No. 61-104) on April 23, 1998:

*In addition, the FAA has revised § 61.129(b)(4) to permit an applicant for a commercial pilot certificate with a multiengine rating to credit the 10 hours of flight time performing the duties of PIC in a multiengine airplane required by that paragraph toward the 100 hours of PIC flight time required under § 61.129(b)(2). This revision is consistent with the provisions of § 61.129(b) as proposed in Notice No. 95-11. As previously noted, proposed § 61.129(b)(4) would have required an applicant to accomplish solo flight time in a multiengine airplane. The solo flight time would have constituted PIC flight time; therefore, the applicant would have been able to credit that flight time toward the requirements of § 61.129(b)(2). However, under § 61.129(b)(4) as adopted in the final rule, an applicant would be performing the duties of PIC rather than acting as PIC. Consequently, that flight time does not constitute PIC flight time. Therefore, the FAA has revised § 61.129(b)(4) to permit the crediting of flight time accomplished under that paragraph toward the requirements of § 61.129(b)(2). However, this revision does not permit an applicant to log the flight time required under § 61.129(b)(4) as PIC flight time under § 61.51(e) unless the applicant holds a private pilot certificate with a multiengine rating and chooses to accomplish the requirements with an authorized instructor.*

Q&A-603

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