

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.184

National Policy

Effective Date:
4/17/12

Cancellation Date:
4/17/13

SUBJ: Incorporation of ATP Certification into an Air Carrier SIC Training Program

1. Purpose of This Notice. This notice provides guidance to principal operations inspectors (POIs) with oversight responsibilities of Title 14 of the Code of Federal Regulations (14 CFR) part 121 certificate holders on incorporating airline transport pilot (ATP) certification into an air carrier second-in-command (SIC) training program.

2. Audience. The primary audience for this notice is Flight Standards District Office (FSDO), Certificate Management Team (CMT), and certificate management office (CMO) aviation safety inspectors (ASI) having oversight of part 121 certificate holders. The secondary audience includes the Flight Standards branches and divisions in the regions and headquarters.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee Web site 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>. Air carriers (operators) can find this notice on the Federal Aviation Administration's (FAA) Web site at <http://fsims.faa.gov>. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. The Airline Safety and Federal Aviation Administration Extension Act of 2010 (Pub. L. 111-216) (the "Act") was signed into law on August 1, 2010. The Act requires all part 121 flightcrew members to hold an ATP certificate by August 2, 2013. Although the FAA published the Pilot Certification and Qualification Requirements for Air Carrier Operations Notice of Proposed Rulemaking, 77 FR 12374, on February 29, 2012 which incorporates the ATP certificate requirement, the Act's requirement is self enacting and will take effect on August 2, 2013 independent of any FAA rulemaking action.

- The FAA previously published information regarding the ATP certificate requirement to operators in the form of Information for Operators (InFO) 10024 on December 15, 2010. However, many air carriers are waiting for the FAA to publish a final rule before taking action.
- The decision to delay ATP certification of SICs could pose significant challenges to these air carriers and the FAA due to the number of SICs who currently only hold a commercial pilot certificate and the training hours and certification activities required to provide ATP certification.

Note: Section 201 of the Act states that “[t]he term ‘flight crewmember’ has the meaning given the term ‘flightcrew member’ in part 1 of title 14, Code of Federal Regulations.” Title 14 CFR part 1 defines “flightcrew member” as “a pilot, flight engineer, or flight navigator assigned to duty in an aircraft during flight time.” Because flight engineers and flight navigators have never been required to qualify as pilots, the FAA is not applying the ATP certification requirement to these flightcrew members.

5. Discussion. Air carriers employing SICs with commercial pilot certificates that choose to provide the training and checking required for ATP certification may be required to submit a revision to their SIC recurrent training curriculum or Continuing Qualification Curriculum for Advanced Qualification Programs (AQP) to accommodate the additional training and evaluation requirements. The revised curriculum(s) must include training on any tasks and maneuvers required for ATP certification for which the SIC has not previously received flight training in new hire, initial, transition, recurrent training, or Indoctrination (AQP), Qualification (AQP) or Continuing Qualification (AQP) training for that carrier. Air carriers may continue to use their approved recurrent/Continuing Qualification (AQP) training curriculum for SICs who already hold an ATP certificate with airplane category and multiengine class or type rating. SIC candidates for ATP certification must:

- Meet the eligibility requirements of 14 CFR part 61, § 61.153(a) and (d);
- Pass the ATP knowledge test required by § 61.153(f);
- Meet the aeronautical experience requirements listed in § 61.159;
- Satisfactorily complete the training required for ATP certification; and
- Successfully pass a proficiency check conducted by an aircrew program designee (APD) for that air carrier, a Training Center Evaluator (TCE) authorized to conduct certification through a check pilot authorization, or an FAA inspector, in accordance with the provisions of § 61.157(f). Under an AQP the certification requirements identified in part 121, § 121.919, as approved within the specific Air Carrier’s AQP, must be met.

6. Regulatory Requirements. There are provisions in part 61 which make allowances for employees of air carriers, such as permitting the use of an expired knowledge test. However each of these provisions generally has a requirement to participate in an “...approved pilot in command training program...” Since these ATP/type rating certifications will be occurring within an SIC training program, and not an approved upgrade curriculum, the allowances are not applicable. The affected provisions are §§ 61.39, 61.51, and 61.157.

7. Regulatory Allowance. Section 61.159(a)(4) requires an applicant for an ATP certificate to have 250 hours of flight time as pilot in command (PIC) or as SIC performing the duties of PIC under the supervision of a PIC (or any combination thereof). As such, an SIC may satisfy § 61.159(a)(4) with fewer than 250 hours of flight time as PIC.

8. Type Rating. When an SIC satisfactorily completes a proficiency check/Line Operational Evaluation (AQP) in an airplane which requires a type rating, or in a Level C or D simulator which replicates an airplane requiring a type rating, then a type rating will be issued concurrently with an ATP certificate in accordance with the provisions of § 61.157(f).

9. Other Considerations. Air carriers may also need to amend their current new hire, initial, and/or transition training curriculum(s) to provide the training and evaluation necessary to achieve ATP certification for SICs who do not hold an ATP certificate. Air carriers may continue to use their approved new-hire, initial, and/or transition training curriculums for SICs who already hold an ATP certificate with an airplane category multiengine class or type rating. The same applies for equivalent curriculums under AQP.

10. Duty Positions. Duty positions (PIC/SIC) are defined by specific job tasks, knowledge, and skills which may be demonstrated from either pilot seat. However, certificate holders should be cognizant of unique aircraft configuration differences that may require seat dependent tasks. Seat dependent tasks may be identified by the manufacturer, the Aircraft Evaluation Group (AEG) in the aircraft's Flight Standardization Board (FSB) report, certificate holders, CMT/CMO, or the AQP extended review team.

11. Action. POIs are encouraged to work with their assigned air carriers to develop a comprehensive plan which incorporates ATP certification into their SIC training program(s).

12. Recording. There are no recording/reporting requirements to this notice.

13. Disposition. We will not incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice should be directed to Robert Burke, AFS-210, Robert.Burke@faa.gov or 202-267-8262.

for 

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Director, Flight Standards Service