



# Federal Aviation Administration

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## Memorandum

Date: 5SEP 15 2009

To: ALL FIRC PROVIDERS

From: *John M. Wensel*  
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Subject: FIRC Graduation Certificate Validity Periods

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On March 28, 2008, a memo was sent to all FIRC providers informing them that if they employed an Airman Certification Representative (ACR), they would not need to issue an FAA Form 8060-4 Temporary Airman Certificate. The FAA Form 8060-4 has a validity period of 120 days.

That memo was followed by another on July 2, 2008, requesting that FIRC providers modify their graduation certificates to reflect that 120 day validity period. Subsequent to that date, all Letters of Authorization sent to FIRC providers carried a paragraph to that effect. This was intended to relate only to the period that the certificate could serve as a substitute for the Form 8060-4. Unfortunately, insufficient clarification was provided and the validity period has been misinterpreted.

14 CFR Part 61.197 states, in pertinent part, that "A person who holds a flight instructor certificate that has not expired may renew that certificate by . . . (2) Presenting to an authorized FAA Flight Standards Inspector . . . (iii) A graduation certificate showing that, *within the preceding 3 calendar months*, the person has successfully completed an approved flight instructor refresher course . . ." (emphasis added). This has not changed. For the purpose of *renewal* of a flight instructor certificate, the applicant must present the appropriate documentation including a valid graduation certificate within 3 months of completion of the FIRC. However, for the purpose of serving as a temporary airman certificate *after* an application has been processed by a certifying official, the certificate is valid as a surrogate for the Form 8060-4 for a period of 120 days, the same as for an actual Form 8060-4.

For example, if an applicant completes a FIRC on January 1, they may use that FIRC as a basis for renewal until the end of April, since the graduation certificate was issued within the three months period (January, February, March) prior to the month in which

application was made (April). After the end of April, they may no longer use that graduation certificate as a basis for renewal. This means that they have until the end of April to complete and submit the application for renewal to a Flight Standards District Office, Aviation Safety Inspector, or other authorized certifying officer. The applicant will then be issued a temporary airman certificate that will be valid for 120 days from the date the certifying official signs the application.

On the other hand, if the FIRC employs an ACR the applicant may complete and submit their application at the time of completion of the FIRC. In that case, the application has been submitted to and signed by a certifying officer (the ACR) and the graduation certificate may now serve as a surrogate Form 8060-4 Temporary Airman Certificate for 120 days, or until the applicant receives their permanent certificate.

To help insure clarity in the future, the FAA requests that all FIRC providers print on the front or back of their graduation certificates the following:

This Graduation Certificate is valid only for 3 calendar months for the purpose of CFI renewal. This Graduation Certificate may be used in place of an 8060-4 Temporary Airman Certificate for a period of 120 days after a completed 8710-1 application for renewal has been submitted to a certifying officer.

Note that the graduation certificate may also be used as a Form 8060-4 when an airman is renewing their flight instructor certificate via the U.S. mail. The procedure for this is outlined in the 8900.1, Combined Electronic Handbook.

Over the coming weeks AFS-810 will be reissuing corrected Letters of Authorization that more clearly and accurately represent the issues expressed in this memo. In addition, guidance will be developed and published in the 8900.1.

This and all referenced letters will be posted at <http://www.faa.gov/pilots/training/firc>. If you have any further questions regarding this issue please contact AFS-800 at (202) 267-8212, and ask for information regarding FIRCs, or email [9-AWA-AVS-AFS-FIRC@FAA.GOV](mailto:9-AWA-AVS-AFS-FIRC@FAA.GOV).