



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

Office of the Chief Counsel

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

JUN -5 2015

Mr. Bryan McLellan  
37 Cross Cut Road  
Surry, ME 04684

Dear Mr. McLellan:

This is in response to your letter of October 9, 2014, requesting a legal interpretation of Title 14 Code of Federal Regulations § 61.129 regarding applying aeronautical experience gained while training for another certificate or rating towards a commercial pilot certificate.

You asked whether a private pilot, with a single engine land rating on his certificate could apply for a commercial pilot certificate with a rotorcraft category and helicopter rating without first obtaining a rotorcraft helicopter rating on his private pilot certificate. Yes, an applicant for a commercial pilot certificate with a rotorcraft category helicopter class rating (rotorcraft helicopter rating) may apply for that rating without holding a rotorcraft category helicopter rating at the private pilot certificate level.

Your letter poses two additional scenarios. In the first scenario, a person with a private pilot certificate with a single-engine land rating receives training from an authorized instructor to obtain a commercial pilot certificate with a rotorcraft category and helicopter class rating and records the training time in his logbook. However, while training for the commercial pilot certificate with rotorcraft helicopter rating, the person passes a practical test to add a rotorcraft helicopter rating to his or her private pilot certificate. You ask whether the training time logged to meet the aeronautical experience requirements for a commercial pilot certificate with a rotorcraft helicopter rating completed before the pilot adds the rotorcraft helicopter rating to his private pilot certificate, still may be counted towards the aeronautical experience requirements for a commercial pilot certificate with a rotorcraft helicopter rating.

The training time logged to meet the commercial pilot requirements may all be counted towards the commercial pilot certificate, as long as the authorized instructor was training the pilot to the commercial pilot standards and recording that time in the logbook as training for a commercial certificate with a rotorcraft helicopter rating, as required by § 61.51(h). Adding the private pilot rotorcraft helicopter rating in the midst of training towards the commercial pilot certificate would not affect the validity of the hours previously logged.<sup>1</sup>

The second scenario you posed concerns a pilot who holds a commercial pilot certificate with a single-engine land rating, and who wishes to add a rotorcraft helicopter rating. You ask whether this pilot would be required to receive an additional 20 hours of training to meet the requirements of § 61.127(b)(3), or is the pilot only required to receive training in the differences between § 61.127(b)(3) and § 61.127(b)(1). Section 61.63(b)(1) states that a

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<sup>1</sup> The pilot must have satisfied the aeronautical experience requirements for a private pilot certificate with a rotorcraft helicopter rating under § 61.109.

person who applies to add a category rating to a pilot certificate, “[m]ust complete the training and have the applicable aeronautical experience.” Accordingly, a person seeking to add a rotorcraft rating to a commercial pilot certificate must meet the aeronautical experience requirements of § 61.129(c), which requires, “(3) 20 hours of training on the areas of operation listed in § 61.127(b)(3) of this part . . .” There is no shortcut available when adding a category rating to an existing certificate, and so that pilot must train the additional 20 hours required by § 61.127(b)(3).

We hope this response has been helpful to you. If you have additional questions, please contact my staff at (202) 267-3073. This response was prepared by Neal O’Hara, an attorney in the Office of Chief Counsel, Regulations Division, and was coordinated with the General Aviation and Commercial Division of the Flight Standards Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Lorelei Peter". The signature is written in a cursive, flowing style with a prominent initial "L".

Lorelei Peter  
Deputy Assistant Chief Counsel for Regulations, AGC-200