



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

Office of the Chief Counsel  
800 Independence Ave., SW.  
Washington, DC 20591

JUL 24 2012

Steven Gibb  
2904 Majestic Isle Dr.  
Clermont, FL 34711

Dear Mr. Gibb:

This letter responds to your request for legal interpretation regarding the medical certification requirements for private pilots who tow gliders and unpowered ultralight vehicles for compensation or hire as permitted by 14 C.F.R. § 61.113(g).

Section 61.23 requires a pilot to hold a third-class medical certificate when exercising the privileges of a private pilot certificate. Because a pilot is required to hold only a private pilot certificate to tow a glider or unpowered ultralight vehicle for compensation or hire, the pilot must hold a third-class medical certificate.

This response was prepared by Anne Moore, an Attorney in the Regulations Division of the Office of the Chief Counsel and coordinated with the Certification and General Aviation Operations Branch of Flight Standards Service. If you have any additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

Rebecca B. MacPherson  
Assistant Chief Counsel for Regulations, AGC-200