



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

MAR 13 2008

Mr. E. Thomas Sisk  
849 Dorcutt Hills Rd.  
Pittsboro, NC 27312

Dear Mr. Sisk:

This responds to your letter dated November 13, 2007, forwarded from Southern District Regional Counsel's Office to the Chief Counsel's Office. The letter requests an interpretation of §61.1(b)(3), Title 14, Code of Federal Regulations, as it pertains to cross-country requirements for instrument rating. You specifically inquire if, for the purposes of the above paragraph, a cross-country flight must include at least one leg that is more than 50 nautical miles (nm) long with a landing at a point more than 50 nm from the original point of departure. At issue are the details of aeronautical experience required for cross-country time under §61.1(b)(3). Although we previously addressed that question in our interpretation from April 17, 1998, which we abide by, our current discussion to your response follows.

Set below is the pertinent part of the regulation.

§61.1(b)(3):

(3) *Cross-country time* means—

(ii) For the purpose of meeting the aeronautical experience requirements (except for a rotorcraft category rating), for an airplane pilot certificate (except for a powered parachute category rating), a commercial pilot certificate, or an instrument rating, or for the purpose of exercising recreational pilot privileges (except in a rotorcraft) under § 61.101 (c), time acquired during a flight—

(A) Conducted in an appropriate aircraft;

(B) That includes a point of landing that was at least a straight-line distance of more than 50 nautical miles from the original point of departure; and

(C) That involves the use of dead reckoning, pilot age, electronic navigation aids, radio aids, or other navigation systems to navigate to the landing point.

As noted above, cross-country flight time is defined as time acquired during a flight that includes a point of landing that is at least a straight-line distance of more than 50 nm from the original point of departure, not the original point of any flight leg. There is no requirement that any specific leg must be 50 nm. Moreover, a cross-country flight may include several legs that are less than a straight-line distance of more than 50 nm from the original point of departure. Nevertheless, at least one leg of the cross-country flight,

however long by itself, must include a point of landing that is at least a straight-line distance of more than 50 nm from the original point of departure (i.e. of the flight, not of that particular leg).

Given the above analysis, the answer is each cross-county flight used to meet the aeronautical experience requirements under 14 CFR §61.1(b)(3) must include one leg that includes a landing that is at least a straight-line distance of more than 50 nm from the original point of departure.

This response was prepared by Adrienne Wojcik, an Attorney in the Regulations Division of the Office of the Chief Counsel, and has been coordinated with the General Aviation Division of Flight Standards Service. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-7776.

Sincerely

A handwritten signature in black ink, appearing to read "Rebecca B. MacPherson", with a long horizontal line extending to the right.

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