

Administration

Advisory Circular

Subject: Pilot Certification and Operations for Sport Pilots, Flight Instructors with a

Sport Pilot Rating, and Simplified

Flight Controls

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This advisory circular (AC) provides guidance on the changes to Title 14 of the Code of Federal Regulations (14 CFR) part <u>61</u> concerning sport pilot certification, training, and operations in accordance with the Modernization of Special Airworthiness Certification (MOSAIC) final rule regulatory amendments. MOSAIC also facilitates the new simplified flight controls designation for aircraft and associated pilot training requirements.

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CHAPTER 1. INTRODUCTION

1.1 Purpose of This Advisory Circular (AC). This AC provides guidance for sport pilot and flight instructor applicants and pilots who seek to obtain or exercise sport pilot or flight instructor certificate with a sport pilot rating privileges under the applicable provisions of Title 14 of the Code of Federal Regulations (14 CFR) part 61. Additionally, this AC also provides guidance for pilots seeking to operate aircraft with a simplified flight controls designation.

Note: This is a guidance document. Its content is not legally binding in its own right and will not be relied upon by the Department as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance document is voluntary only. Nonconformity will not affect rights and obligations under existing statutes and regulations.

- **1.2** Audience. The primary audience for this AC is applicants, pilots, flight instructors, designated examiners, and aviation safety inspectors (ASI) who conduct certification functions for pilots or have oversight of a designee who performs pilot or instructor certifications. The secondary audience includes Flight Standards Service (FS) offices.
- **1.3** Where You Can Find This AC. You can find this AC on the Federal Aviation Administration's (FAA) website at https://www.faa.gov/regulations_policies/advisory_circulars and the Dynamic Regulatory System (DRS) at https://drs.faa.gov.
- **1.4** Effective Date. This AC is effective as of October 22, 2025.
- 1.5 **Background.** In 2004, the FAA published the final rule titled, Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft (69 FR 44772), which established rules for the manufacture, certification, operation, and maintenance of light-sport aircraft (LSA). That rule provided for the operation and manufacture of aircraft weighing less than 1,320 pounds (or 1,430 pounds for aircraft intended for operation on water). These "light-sport" aircraft included airplanes, gliders, balloons, powered parachutes, weight-shift-control aircraft, and gyroplanes. This rule defined the performance limits and design criteria of LSA in 14 CFR § 1.1.
- **1.5.1** Certification of Sport Pilots. The 2004 final rule provided for the certification of sport pilots under 14 CFR part 61 subpart <u>J</u>, and flight instructors with a sport pilot rating under 14 CFR part 61 subpart <u>K</u>, limited to the operation of aircraft that met the 14 CFR § 1.1 LSA definition.
- 1.5.2 <u>Modernization of Special Airworthiness Certification</u>. In 2025, the FAA published the "Modernization of Special Airworthiness Certification" final rule ("MOSAIC"). This rule separated aircraft certification requirements from pilot certification requirements.
 - 1.5.2.1 Sport pilot certification and operational privileges are now addressed within 14 CFR part 61, including performance limits and design requirements for aircraft that sport pilots and flight instructors with a sport pilot rating may operate. The FAA expanded what aircraft sport pilots can operate and added

- operational privileges that require additional training and qualification requirements. Chapter 3, Sport Pilot Training, Certification, and Operational Privileges, further discusses those changes to 14 CFR part 61 specific to sport pilots (subpart J) and flight instructors with a sport pilot rating (subpart K).
- 1.5.2.2 In addition to the expanded operational privileges for sport pilots, the MOSAIC final rule also integrated aircraft with a simplified flight controls designation into the regulatory framework, as well as the specific training and endorsement requirements for pilots seeking to act as pilots in command (PIC) of those aircraft. The detailed training is described in Chapter 4, Simplified Flight Controls Designation.
- **1.6 AC Feedback Form.** For your convenience, the AC Feedback Form is the last page of this AC. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this AC on the Feedback Form.

CHAPTER 2. SPORT PILOT GENERAL PROVISIONS

- 2.1 Sport Pilot Aircraft Design and Performance Limitations. Title 14 CFR § 61.316 prescribes the new performance limits and design requirements for the aircraft that sport pilots may operate. These changes allow more aircraft types to be eligible for sport pilot operations, provided the aircraft meets the performance and design limitations of 14 CFR § 61.316. This chapter describes the aircraft performance and design limitations for sport pilot operations and highlights significant changes.
- **2.1.1** Weight Limitation. There is no longer a specified weight limitation for the aircraft a sport pilot may operate. The FAA determined that performance-based standards are more appropriate based on the safety continuum concept, and the other existing performance and design characteristics provide appropriate limitations for sport pilot operations.
- 2.1.2 <u>Maximum Airspeed Limitation</u>. The MOSAIC rulemaking removed historical maximum airspeed limitations for sport pilot operations. Formerly, under the 14 CFR § 1.1 LSA definition, sport pilots were limited to operating an aircraft with a maximum airspeed in level flight with maximum continuous power (V_H) of not more than 120 Knots Calibrated Airspeed (KCAS), or a never-exceed speed (V_{NE}) of 120 KCAS for gliders. However, the FAA retained 14 CFR § 61.327, which requires specific training and endorsement for sport pilots seeking to operate an aircraft with a V_H above or below 87 KCAS. This is further discussed in Chapter 3.
- 2.1.3 Powerplant Limitation. The MOSAIC rulemaking removed the historical limitation restricting sport pilots to operating aircraft with a single reciprocating engine. The new 14 CFR § 61.316 allows for the operation of aircraft with any powerplant types under sport pilot privileges. However, with the removal of the engine design limitation, the FAA amended 14 CFR § 61.315 to specifically state that a sport pilot may not act as PIC of an aircraft that requires a pilot to hold a type rating, in accordance with 14 CFR § 61.31(a). The FAA continues to prohibit a sport pilot from operating an aircraft that requires a pilot to hold a type rating due to the complexity associated with operating those aircraft and the training footprint of sport pilots.
 - 2.2 Aircraft Conformity Since Original Aircraft Certification. LSA previously defined in 14 CFR § 1.1 required an aircraft to have met all design requirements since its original certification. The MOSAIC final rule retains the "since its original certification" requirement for aircraft performance limits and design requirements in the new 14 CFR § 61.316(a). Sport pilots cannot operate an aircraft that has been modified since its original certification to otherwise qualify an aircraft for sport pilot use under 14 CFR § 61.316(a). Modifications to an aircraft to meet 14 CFR § 61.316(a) criteria may allow operation of aircraft with overall increased complexity to a level that is inappropriate for the skill and training capabilities of the sport pilot. Therefore, sport pilots may only act as PICs of an aircraft meeting the performance limits and design requirements of 14 CFR § 61.316(a) if that aircraft meets the following requirements since its original certification.

2.2.1 <u>Maximum Stalling Speed or Minimum Steady Flight Speed</u>. A maximum stalling speed or minimum steady flight speed without the use of lift-enhancing devices (V_{S1}) of not more than 45 KCAS, except for airplanes, which must have a V_{S1} speed of not more than 59 KCAS at the aircraft's maximum certificated takeoff weight and most critical center of gravity (CG) (14 CFR § 61.316(a)(1)).

- 2.2.2 <u>Seating Capacity</u>. A maximum seating capacity of 2 persons, except for airplanes, which may have a maximum seating capacity of 4 persons (14 CFR § 61.316(a)(2)).
- **2.2.3** Non-Pressurization Cabin. A non-pressurized cabin, if equipped with a cabin (14 CFR § 61.316(a)(3)).
- **2.2.4** Gyroplanes. For gyroplanes, a fixed-pitch, semi-rigid, teetering, two-blade rotor system (14 CFR § 61.316(a)(4)).
- 2.2.5 <u>Powered Aircraft Other Than Balloons or Airships</u>. The loss of partial power would not adversely affect directional control of the aircraft, and the aircraft design must allow the pilot the capability of establishing a controlled descent in the event of a partial or total powerplant failure (14 CFR § 61.316(a)(5)).
- **2.2.6** <u>Helicopters.</u> Must be certificated with the simplified flight controls designation (14 CFR § 61.316(a)(6)).
- 2.2.7 Gliders. Specifically required by 14 CFR § 61.316(a)(7) to have fixed or retractable landing gear. As discussed, 14 CFR § 61.316(a) requires an aircraft to have met the performance limits and design requirements since its original certification. Consequently, for sport pilot operations, a glider must have had that fixed or retractable landing gear since its original certification.
- 2.2.8 Powered Aircraft Other Than a Glider. For powered aircraft other than a glider, fixed landing gear, except as provided in 14 CFR § 61.316(b) (14 CFR § 61.316(a)(8)), and a fixed, ground-adjustable, or an automated controllable pitch propeller, except as provided in 14 CFR § 61.316(b) (14 CFR § 61.316(a)(9)).
- 2.2.9 Retractable Gear and Propeller Privileges. Title 14 CFR § 61.316(b) permits sport pilots to act as PICs of an aircraft with retractable landing gear or an airplane with a manual controllable pitch propeller after receiving the specified training and instructor endorsement. However, these systems are not required to have been installed since the aircraft's original certification. Therefore, 14 CFR § 61.316(b) allows a sport pilot to operate aircraft (except for gliders) that have had landing gear modifications and airplanes that have had propeller modifications if those sport pilots meet the training and endorsement requirements set forth in 14 CFR § 61.331.

CHAPTER 3. SPORT PILOT TRAINING, CERTIFICATION, AND OPERATIONAL PRIVILEGES

3.1 Sport Pilot Certification and Privileges. Title 14 CFR part <u>61</u> prescribes the requirements for obtaining sport pilot certificates and flight instructor certificates with a sport pilot rating and the associated privileges. Unlike higher-grade pilot certificates, a sport pilot certificate is not issued with category and class ratings. Instead, sport pilots obtain privileges endorsed in their logbook for the specific category and class, and, in some cases, specific make and model (M/M) aircraft.

Note: Pilots who hold a higher grade of pilot certificate with the appropriate category and class rating but choose to exercise those same category and class privileges at the sport pilot level must comply with the sport pilot privileges and limitations of 14 CFR part 61.

3.2 Maximum Stalling Speed Limitation.

- 3.2.1 <u>Stalling and Flight Speeds</u>. Title 14 CFR § <u>61.316(a)(1)</u> permits a sport pilot to act as PIC of an aircraft with a maximum stalling speed or minimum steady flight speed without the use of lift-enhancing devices (V_{S1}) of not more than 45 KCAS, except for airplanes, which must have a V_{S1} speed of not more than 59 KCAS at the aircraft's maximum certificated takeoff weight and most critical CG.
- 3.2.2 Aftermarket Alterations. For sport pilot operations, aircraft must meet the 14 CFR § 61.316(a)(1) stalling speed limitation since its original certification, as discussed in paragraph 2.2. An aircraft may not use aftermarket alterations (e.g., vortex generators, Short Takeoff and Landing (STOL) kits, or lift-enhancing designs) that lower the stalling speed to meet aircraft eligibility requirements of 14 CFR § 61.316(a) for sport pilot operations. Nevertheless, the installation of these modifications after an aircraft's original certification is permitted. However, the aircraft's original certification V_{S1} CAS stalling speed, prior to the installation of the modification, must meet 14 CFR § 61.316 requirements. For example, for an airplane to meet those requirements, that airplane must not exceed the maximum 59 KCAS V_{S1} stalling speed at its original certification.
 - 3.3 Sport Pilot Maximum Seating Capacity. Title 14 CFR § 61.316(a)(2) permits sport pilots to act as PICs of an aircraft with a maximum seating capacity of 2 persons, except for airplanes, which MOSAIC expanded to a maximum seating capacity of 4 persons. This change allows pilots to operate a wider variety of certificated airplanes. However, the number of people a sport pilot may carry on board an aircraft has not changed.
- 3.3.1 Sport Pilot Privilege Maximum Occupant Limitation. A sport pilot acting as PIC may only carry one passenger on board (14 CFR § 61.315(c)(4)). For instance, a sport pilot may act as PIC of an airplane with a seating capacity of up to four seats but may only operate that airplane with one passenger, necessarily leaving up to two seats vacant. Similarly, a flight instructor with a sport pilot rating may only carry their student on board (14 CFR § 61.415(k)). Pilots who hold a higher-grade pilot certificate may choose to utilize sport pilot privileges, but when exercising sport pilot privileges, pilots

must comply with sport pilot privileges and limitations, in accordance with 14 CFR §§ 61.301(c) and 61.303. With respect to 14 CFR § 61.316(a)(2) seating limitations, the pilot may only act as PIC of an aircraft with a maximum seating capacity of two seats, or four seats in the case of airplanes.

- 3.3.2 Seating Removal Limitation. Title 14 CFR § 61.316(a) requires an aircraft to have met the performance limits and design requirements since its original certification. Therefore, a sport pilot may only act as PIC of an aircraft that has met the maximum seating capacity requirements of 14 CFR § 61.316(a)(2) since its original certification. The FAA noted during MOSAIC rulemaking that simply removing seats from an aircraft originally certificated with a seating capacity of more than two seats (or four seats for airplanes) does not change the originally certificated design and performance of that aircraft, which accommodated the larger seating capacity and is associated with heavier, more complex aircraft. Consequently, a sport pilot may not remove seats from an aircraft to establish eligibility under 14 CFR § 61.316.
 - 3.4 Endorsement Requirements Based on Maximum Continuous Power (V_H). As noted in paragraph 2.1.2, MOSAIC removed the former 120 KCAS V_H speed limitation (or V_{NE} in the case of gliders) for aircraft a sport pilot may operate. However, the sport pilot training and endorsement requirements of 14 CFR § 61.327 were retained.
- 3.4.1 V_H Less Than or Equal to 87 Knots. A sport pilot may operate an airplane meeting the performance limits and design requirements of 14 CFR § 61.316 with a V_H less than or equal to 87 KCAS by complying with 14 CFR § 61.327(a). This requires the sport pilot to receive and log ground and flight training from an authorized instructor in an airplane that has a V_H less than or equal to 87 KCAS and receive a logbook endorsement from the instructor who provided the training stating the pilot is proficient to operate an airplane with a V_H less than or equal to 87 KCAS.

Note: The training and endorsement requirements of 14 CFR § 61.327(a) are not required if a sport pilot has logged flight time as PIC of an airplane with a V_H less than or equal to 87 KCAS prior to April 2, 2010.

- 3.4.2 V_H Greater Than 87 Knots. A sport pilot may operate an aircraft meeting the performance limits and design requirements of 14 CFR § 61.316 with a V_H greater than 87 KCAS by complying with 14 CFR § 61.327(b). This requires the sport pilot to receive and log ground and flight training from an authorized instructor in an aircraft that has a V_H greater than 87 KCAS and receive a logbook endorsement from the instructor who provided the training stating the pilot is proficient to operate an aircraft with a V_H greater than 87 KCAS.
 - 3.5 Airplanes With a Manual Controllable Pitch Propeller. Historically, sport pilot operations were limited to either a fixed or ground-adjustable propeller for powered aircraft. Under 14 CFR § 61.316(b), sport pilots are now permitted to operate airplanes equipped with a manual controllable pitch propeller. To exercise these privileges, a sport pilot must meet the training and endorsement requirements specified in 14 CFR § 61.331(b). The additional training and endorsement mitigate the increased risks

- associated with operator errors affecting safety. To note, sport pilots may also operate automated controllable pitch propellers, but they do not need to meet 14 CFR § 61.316(b).
- **3.5.1** Sport Pilot Training and Endorsement Requirements for Propellers. Title 14 CFR § 61.331(b) details the training and endorsement requirements for sport pilots seeking privileges to operate an airplane with a manual controllable pitch propeller. Sport pilots have two options to comply with these requirements:
 - 3.5.1.1 A sport pilot may satisfy the training and endorsement requirements required for operating complex airplanes as specified in 14 CFR § 61.31(e); or
 - 3.5.1.2 A sport pilot may receive and log ground and flight training from an authorized instructor in an airplane that has a manual controllable pitch propeller and receive an endorsement from the instructor certifying that they are proficient to operate the airplane.
- 3.5.2 Flight Instructor Training and Endorsement Requirements. Title 14 CFR § 61.415(l) requires flight instructors with a sport pilot rating to complete the additional training and receive an instructor endorsement for the operation of airplanes equipped with manual controllable pitch propellers, as specified in 14 CFR § 61.331(b), prior to providing flight instruction in an airplane with a manual controllable pitch propeller.
 - 3.6 Aircraft With Retractable Landing Gear. Historically, sport pilots were only permitted to operate powered aircraft with fixed landing gear, except for aircraft intended for operation on water, which required either fixed or retractable landing gear. Title 14 CFR § 61.316 retains the requirement for powered aircraft to have fixed landing gear and adds a new provision to permit sport pilots to operate an aircraft that has retractable landing gear by complying with the training and endorsement requirements specified in 14 CFR § 61.331(a).
- 3.6.1 Sport Pilot Training and Endorsement Requirements for Retractable Gear. Title 14 CFR § 61.331(a) specifies the training and endorsement requirements for sport pilots seeking privileges to operate an aircraft with retractable landing gear. Sport pilots have two options to comply with these requirements:
 - 3.6.1.1 A sport pilot may satisfy the training and endorsement requirements required for operating complex airplanes as specified in 14 CFR § 61.31(e); or
 - 3.6.1.2 A sport pilot may receive and log ground and flight training from an authorized instructor in an aircraft that has retractable landing gear and receive an endorsement from the instructor certifying that they are proficient to operate that aircraft.
- 3.6.2 Operation on Water With Retractable Landing Gear. The MOSAIC final rule clarifies that a sport pilot may operate a powered aircraft intended for operation on water with either fixed or retractable landing gear but requires these sport pilots to obtain the training and endorsement specified in 14 CFR § 61.331(a). Historically, sport pilots were

permitted to operate aircraft intended for operation on water with retractable landing gear without requiring specific training or endorsement. Therefore, sport pilots who historically operated an aircraft intended for operation on water with retractable landing gear may continue to do so without obtaining the training and endorsement of 14 CFR § 61.331(a). Title 14 CFR § 61.331(c) states that the training and endorsement is not required for pilots that logged PIC time in an aircraft intended for operation on water with retractable landing gear before October 22, 2025. Sport pilots who did not log PIC time in an aircraft intended for operation on water with retractable landing gear prior to October 22, 2025, must obtain the endorsement specified in 14 CFR § 61.331(a), which will ensure pilots are trained for these types of operations and mitigates the risk associated with the potential mishandling of retractable landing gear on an aircraft intended for operation on water.

- 3.6.3 Gliders With Fixed or Retractable Landing Gear. Sport pilots continue to be permitted to operate gliders with fixed or retractable landing gear. Sport pilots are not required to comply with the training and endorsement requirements of 14 CFR § 61.331 to operate a glider with retractable landing gear.
- **3.6.4** Flight Instructor Training and Endorsement Requirements. Title 14 CFR § 61.415(1) requires flight instructors with a sport pilot rating to complete the additional training and receive an instructor endorsement for the operation of aircraft with retractable landing gear, as specified in 14 CFR § 61.331(a), prior to providing flight instruction in an aircraft with retractable landing gear.
 - **3.7 Night Operations.** Historically, sport pilot privileges did not include night operations. The FAA now permits night operations under 14 CFR § 61.329, which requires additional night training, an authorized instructor qualifying endorsement, and additional medical qualifications.
- 3.7.1 Training Requirements for Sport Pilot Night Operations. For a sport pilot to operate at night, they must receive 3 hours of night flight training from an authorized instructor (14 CFR § 61.329(a)). This training must include the following: (1) one cross-country flight at night with a landing at an airport at least 25 nautical miles (NM) from the departure airport, except for powered parachutes; and (2) 10 takeoffs and 10 landings to a full stop at night.
 - 3.7.1.1 Night flight training time can count toward the total flight time requirement in 14 CFR § 61.313.
 - 3.7.1.2 Any night flight training received while obtaining a higher-grade certificate may count toward the time required in 14 CFR § 61.329. This previous experience may only be credited toward the same category and class of sport pilot night privileges sought. The pilot must still obtain the required endorsement specified in 14 CFR § 61.329(c), regardless of whether the pilot holds a higher grade of pilot certificate.

3.7.2 Endorsement Requirements for Sport Pilot Night Operations. Upon obtaining the required night flight training of 14 CFR § 61.329(a), a sport pilot must receive a logbook endorsement from an authorized instructor certifying that they met those training requirements and are proficient in the operation of the aircraft at night in the category and class for which the sport pilot seeks privileges (14 CFR § 61.329(c)).

- 3.7.3 <u>Medical Eligibility Requirements Specific to Sport Pilot Night Operations</u>. To act as PIC at night using sport pilot privileges, a pilot must hold an FAA medical certificate issued under 14 CFR part <u>67</u> (i.e., at least a third-class medical certificate) or hold a driver's license and meet the 14 CFR § <u>61.113(i)</u> BasicMed conditions and limitations (14 CFR § 61.329(b)).
 - 3.7.3.1 Though a third-class medical certificate and BasicMed compliance are also used to exercise private pilot privileges, when complying with either of these medical requirements for the purposes of exercising sport pilot privileges, sport pilot privileges and limitations continue to apply (e.g., sport pilot certificate limits under 14 CFR § 61.315 and aircraft performance limitations and design requirements under 14 CFR § 61.316). For example, a sport pilot may not carry more than one passenger on board an aircraft, regardless of their medical qualifications.
 - 3.7.3.2 A sport pilot is only affected by the additional medical qualification requirements if they choose to exercise these new, optional night privileges (14 CFR § 61.23(c)(1)(vi)). However, the longstanding medical requirements for sport pilot daytime operational privileges are unchanged under MOSAIC. Sport pilots may operate powered aircraft during the day if they hold either a medical certificate or U.S. driver's license, in accordance with 14 CFR § 61.23(c)(1)(i), (ii), or (iii), as appropriate. Sport pilots may operate a glider or balloon during the day without a medical certificate, in accordance with 14 CFR § 61.23(b)(1), (2), or (6), as appropriate.
- **3.7.4** Flight Instructor Qualifications to Provide Night Flight Training to Sport Pilot. The night training and endorsement can only be obtained from a qualified instructor.
 - 3.7.4.1 In accordance with 14 CFR § 61.415(n), a flight instructor with a sport pilot rating (14 CFR part 61 subpart K) may provide training in an aircraft at night if they completed the night experience of 14 CFR § 61.329(a) and received the endorsement of 14 CFR § 61.329(c) in the category and class of aircraft in which they intend to provide flight training. Additionally, a flight instructor with a sport pilot rating would need to meet the medical requirements of 14 CFR § 61.329(b) to provide flight training in an aircraft at night.
 - 3.7.4.2 A 14 CFR part 61 subpart H flight instructor may provide the night flight training and endorsement in accordance with 14 CFR part 61 subpart J if they are rated in the subject aircraft for which they are providing the training. A 14 CFR part 61 subpart H instructor must hold at least a third-class medical

certificate or BasicMed compliance to provide this training, in accordance with 14 CFR § 61.23(a)(3)(ii) or § 61.329(b), as applicable.

- 3.8 Compensation for Flight Training Provided by Flight Instructors With a Sport Pilot Rating. Sport pilots may not act as PICs of an aircraft that is carrying a passenger or property for compensation or hire or in furtherance of a business. However, the FAA acknowledges that flight instructors with a sport pilot rating (14 CFR part 61 subpart K) receive compensation for conducting flight training. MOSAIC added new 14 CFR § 61.413(d) to specifically permit this privilege for 14 CFR part 61 subpart K flight instructors. Therefore, a flight instructor with a sport pilot rating may receive compensation for providing flight training in accordance with 14 CFR part 61 subpart K. A flight instructor may not receive compensation for any other activities or forms of aerial work.
- 3.9 Aviation Training Device or Flight Simulation Training Device (FSTD) Credit. Sport pilots may credit up to 2.5 hours of training credit in a qualified FSTD or FAA-approved aviation training device representing the appropriate category and class of aircraft to meet the experience requirements of 14 CFR part 61 subpart J if that training was received from an authorized instructor (14 CFR § 61.313(b)).
- 3.10 Practical Test Required for an Airplane or Helicopter Privilege. The MOSAIC final rule adopted a new requirement in 14 CFR § 61.321(b) to require a practical test when adding an airplane or helicopter privilege to a sport pilot certificate. Though the practical test is a new requirement for the new helicopter privilege, this is a change for sport pilots adding airplane privileges, as sport pilots are no longer able to accomplish a sport pilot proficiency check when adding airplane privileges. Due to the new performance limits and design requirements for aircraft, the FAA determined that the operational differences between airplane and helicopter compared to the other sport pilot privileges are significant enough to warrant a practical test. As a result, 14 CFR part 61 now requires a pilot seeking to add an airplane single-engine or rotorcraft-helicopter privilege to their existing sport pilot certificate to accomplish a practical test. However, pursuant to 14 CFR § 61.321(a), a proficiency check is still required when adding an additional glider, gyroplane, airship, balloon, powered parachute, or weight-shift-control sport pilot privilege.
- 3.11 New Rotorcraft-Helicopter Privilege for Sport Pilots and Flight Instructors With a Sport Pilot Rating.
- **3.11.1** Helicopter Privilege. MOSAIC introduced a new helicopter privilege for sport pilots. These helicopters must be certificated with a simplified flight controls designation during aircraft certification and meet the performance limits and design requirements of 14 CFR § 61.316.
- 3.11.2 Sport Pilot Training and Flight Time Requirements. A sport pilot who seeks to obtain a rotorcraft category and helicopter class privilege is required to log at least 30 hours of helicopter flight time, including at least 15 hours of flight training, 5 hours of which must

- be solo flight training in the areas of operation listed in 14 CFR § 61.311. Refer to 14 CFR § 61.313(a)(9) for additional requirements within the 30 hours.
- 3.11.3 Flight Instructors With a Sport Pilot Rating. A pilot who seeks to obtain a flight instructor with sport pilot rating for a rotorcraft category and helicopter privilege is required to log at least 150 hours of flight time as a pilot, including at least 50 hours of helicopter flight time, and at least 15 hours of PIC time in a helicopter. Refer to 14 CFR § 61.411(h). Additionally, pursuant to 14 CFR § 61.409, the pilot must receive and log ground and flight training from an authorized instructor on the areas of operation of 14 CFR § 61.409 in the rotorcraft category and helicopter class.
 - 3.12 Sport Pilot and Sport Pilot Flight Instructor for Rotorcraft-Helicopter; Airman Certification Standards (ACS). With the anticipation of aircraft certification of helicopters with simplified flight controls, the FAA created two ACS documents: FAA-S-ACS-26, Sport Pilot for Rotorcraft Category Helicopter—Simplified Flight Controls Privilege Airman Certification Standards; and FAA-S-ACS-31, Flight Instructor with a Sport Pilot Rating for Rotorcraft Category Helicopter—Simplified Flight Controls Privilege Airman Certification Standards. These ACS documents are incorporated by reference in 14 CFR § 61.14 and are required when taking a practical test. The tasks listed in the ACS documents align with the areas of operation in 14 CFR §§ 61.311 and 61.409 for the sport pilot or flight instructor with a sport pilot rating in a helicopter with simplified flight controls.

CHAPTER 4. SIMPLIFIED FLIGHT CONTROLS DESIGNATION

4.1 Model-Specific Endorsement for Aircraft Certificated With a Simplified Flight Controls Designation. The MOSAIC rulemaking created a new aircraft designation: simplified flight controls. Aircraft with simplified flight controls are dependent upon automation rather than a pilot's hand-flying skills to control the aircraft's flight path and available power. As a result, the FAA added training and qualification requirements for all pilots seeking to act as PICs of an aircraft with a simplified flight controls designation, regardless of their grade of certificate. Specifically, to operate an aircraft with simplified flight controls, a pilot must obtain model-specific training and a logbook endorsement from an authorized instructor in accordance with 14 CFR § 61.31(1) if the pilot already holds the applicable category and class rating or privilege. If the pilot is seeking an initial certificate or rating in that category and class, the pilot must take a practical test. Refer to 14 CFR § 61.45(h).

- 4.1.1 Simplified Flight Controls Versus Conventional Flight Controls. With the addition of this new simplified flight controls aircraft designation, some pilots may begin their flying career in an aircraft with the simplified flight controls designation. Pilots earning a certificate with an initial aircraft category and class rating or privilege in an M/M with simplified flight controls designation will only be able to fly that specific M/M aircraft after completion of a practical test. Refer to 14 CFR § 61.45(g)(4) and (h)(2). To fly an aircraft within the same category and class without simplified flight controls, the pilot will need to take an additional practical test to demonstrate their ability and skills in an aircraft equipped with conventional flight controls, in accordance with 14 CFR § 61.45(h)(2). For example, if a pilot started their flying in a rotorcraft-helicopter with simplified flight controls and they now seek to operate a helicopter with conventional flight controls, that pilot will need to take an additional practical test.
- **4.1.2** <u>Flight Training Hour Requirements</u>. There are no prescriptive training hour requirements for simplified flight controls training in accordance with 14 CFR § 61.31(l). The intent is to retain flexibility and deference to an authorized instructor's expertise in determining when a person is sufficiently proficient in the aircraft operation.
- 4.1.3 Pilot Training and Endorsement Requirements. Training and endorsement are required for each M/M of aircraft with a simplified flight controls designation prior to operating as PIC under 14 CFR § 61.31(1). This training can be combined with an initial category and class rating or privilege for a pilot certificate, in which case a practical test is required.
- 4.1.4 Multiple Category and Class Ratings or Privileges With Simplified Flight Controls. Additionally, if a person already holds a category and class rating or privilege with an M/M simplified flight controls limitation and seeks to operate a different category and class of aircraft with a simplified flight controls designation, that person is required by 14 CFR § 61.45(h)(2) to complete a practical test for that category and class of aircraft. This is assuming the person does not already hold the category and class rating or privilege on their certificate. For example, if a pilot holds a rotorcraft-helicopter with simplified flight controls limitation and seeks to add an Airplane Single-Engine Land (ASEL) with simplified flight controls but does not already hold the ASEL rating on their

certificate, they will need to take a practical test in an airplane with simplified flight controls designation. If they do hold the category and class rating or privilege, they will only need the training and endorsement for the specific M/M simplified flight controls limitation, per 14 CFR § 61.45(h)(1). As another example, if a pilot holds a rotorcraft-helicopter with simplified flight controls limitation and seeks to operate a different M/M helicopter with simplified flight controls, they will need the specific M/M training and endorsement but are not required to complete a practical test since they already hold that category and class rating or privilege.

- 4.1.5 <u>Airman Certification Simplified Flight Controls Requirements Table</u>. Appendix <u>A</u> provides a table of examples of scenarios for airman certification simplified flight controls requirements and will help pilots navigate the new simplified flight controls training and testing requirements.
- 4.1.6 Simplified Flight Controls Experience Credit. As specified in 14 CFR § 61.9, the FAA set limitations on the applicability of pilot time acquired while operating an aircraft with a simplified flight controls designation that may be credited when seeking a higher-grade pilot certificate or rating. Experience gained by piloting aircraft with simplified flight controls is not equal to the experience acquired when operating aircraft equipped with conventional flight controls due to the reliance on automated operations. The unique operating characteristics of each M/M aircraft with simplified flight controls designation are expected to result in significant differences in pilot skills required for safe operations.
 - 4.1.6.1 Consequently, PIC flight time gained in an aircraft with simplified flight controls is inapplicable for use in satisfying aeronautical experience requirements for higher grades of pilot certificates using conventional flight controls. For example, a person seeking a Commercial Pilot Certificate with a rotorcraft category helicopter class rating may not use pilot time acquired in a helicopter with simplified flight controls designation to meet the PIC flight time experience requirement in 14 CFR § 61.129(c)(2)(i), which requires 35 hours of PIC flight time in a helicopter, due to the differing operational characteristics between the flight controls.
- 4.1.7 Private Pilot Practical Test in an Aircraft With Simplified Flight Controls Designation. Pursuant to 14 CFR § 61.9, Private Pilot Certificate applicants who present an aircraft with the simplified flight controls designation for the practical test may count solo time or PIC time in 14 CFR part 61 subpart E. This exception is not provided for higher-grade pilot certificates because the higher-grade pilot certificates require greater aeronautical knowledge, skills, and experience, and afford greater operational privileges (e.g., carrying passengers for compensation or hire) that are higher on the safety continuum and therefore require greater risk mitigation.
 - **4.2** Flight Instructor Training and Endorsement Requirements for Aircraft With a Simplified Flight Controls Designation. Both 14 CFR part 61 subpart H and subpart K flight instructors are required to obtain the M/M limitation prior to conducting flight instruction in that M/M of aircraft with simplified flight controls designation, in accordance with 14 CFR §§ 61.195(m) and 61.415(m).

4.2.1 Initial Cadre Instructor Pilots. Since the simplified flight controls designation is a new regulatory requirement, the FAA created a provision in 14 CFR § 61.195(n) for a pilot to become initially qualified in an aircraft that is certificated with this simplified flight controls designation. During the aircraft certification process, pilots employed by or used by the manufacturer will gain experience in aircraft with simplified flight controls and be the best qualified persons to provide initial instruction to authorized instructors and Designated Pilot Examiners (DPE). Title 14 CFR § 61.195(n) refers to these persons as instructor pilots. The instructor pilot must comply with the operational limitations of the aircraft to provide flight training. AC 61-65, Certification: Pilots and Flight and Ground Instructors, provides sample endorsements the instructor pilots and initial cadre of flight instructors should receive in order to provide training.

- 4.2.2 Instructor Pilot Prerequisite Qualifications. Only flight instructors who hold a 14 CFR part 61 subpart H flight instructor certificate with the appropriate category and class rating are authorized to receive training from instructor pilots employed or used by the aircraft manufacturer. This will establish the initial cadre of authorized instructors (i.e., other 14 CFR part 61 subpart H instructors and 14 CFR part 61 subpart K flight instructors) who can conduct the required model-specific flight training in an aircraft with a simplified flight controls designation required by 14 CFR § 61.31(1).
- **4.2.3** <u>Instructor Pilot Training Requirements</u>. The training requirements identified in 14 CFR § 61.195(n)(2) largely mirror those set forth in 14 CFR § 61.31(l) (i.e., have received and logged model-specific training in that aircraft from an instructor pilot for the manufacturer of the aircraft and received an endorsement validating proficiency).
- 4.2.4 Flight Instructor Privileges. Once a manufacturer instructor pilot trains and qualifies a 14 CFR part 61 subpart H flight instructor (14 CFR § 61.195(n)), that subpart H flight instructor may then train and endorse other subpart H flight instructors or 14 CFR part 61 subpart K flight instructors (14 CFR § 61.415(n)). The instructors may then train and endorse pilots, sport pilots, and pilot applicants (14 CFR § 61.31(1)).

11/14/25 AC 61-146 Appendix A

APPENDIX A. AIRMAN CERTIFICATION SIMPLIFIED FLIGHT CONTROLS REQUIREMENTS TABLE

Note: This table shows some examples of possible certification scenarios for pilots seeking to operate an aircraft with a simplified flight controls designation.

Rotorcraft-Helicopter			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
 Sport pilot certificate with the following: Rotorcraft-helicopter privilege; and Specific make and model (M/M) simplified flight controls limitation. 	To operate another model of rotorcraft-helicopter with simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(1) for each M/M.	Title 14 CFR § 61.45(h)(1).
 Sport pilot certificate with the following: Rotorcraft-helicopter privilege; and Specific M/M simplified flight controls limitation. 	A recreational pilot certificate or higher with rotorcraft-helicopter rating (regardless of a simplified flight controls designation).	The applicable requirements for that grade of certificate, including a practical test.	Title 14 CFR part 61 applicable subpart, and subject to 14 CFR § 61.9.
 Sport pilot certificate with the following: Rotorcraft-helicopter privilege; and Specific M/M simplified flight controls limitation. 	To operate an airplane category with simplified flight controls designation as an initial applicant for airplane category (and appropriate class) at any certificate grade.	A practical test for that certificate (if applicable), category, and class of aircraft.	Title 14 CFR § 61.45(h)(2) and the applicable certificate requirements.
Sport pilot certificate with the following: • Rotorcraft-helicopter privilege; and • Specific M/M simplified flight controls limitation.	To operate any rotorcraft or airplane category without simplified flight controls designation at the same certificate level.	A practical test for that category and class of aircraft.	Title 14 CFR §§ 61.45(h)(2) and 61.316.
 Sport pilot certificate with the following: Rotorcraft-helicopter privilege; and Specific M/M simplified flight controls limitation. 	To operate a different category and class, other than airplane category, at the same certificate level.	A proficiency check.	Title 14 CFR § 61.321.

Rotorcraft-Helicopter			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Recreational pilot certificate or higher with the following: • Rotorcraft category and helicopter class rating; and • Specific M/M simplified flight controls limitation.	To operate a different M/M of rotorcraft-helicopter with a simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.45(h)(1).
Recreational pilot certificate or higher with the following: • Rotorcraft category and helicopter class rating; and • Specific M/M simplified flight controls limitation.	To operate a rotorcraft-helicopter without a simplified flight controls designation at the same certificate level.	A practical test for that category and class of aircraft equipped with conventional flight controls.	Title 14 CFR § 61.45(h)(2).
Recreational pilot certificate or higher with the following: • Rotorcraft category and helicopter class rating; and • Specific M/M simplified flight controls limitation.	To operate an Airplane Category, Single-Engine Land class aircraft with a simplified flight controls designation at the same certificate level.	The requirements to add another category and class rating on the applicable pilot certificate, including a practical test.	Title 14 CFR §§ 61.45(h)(2) and 61.63(b).
Recreational pilot certificate or higher with the following: • Rotorcraft category and helicopter class rating; • Specific M/M simplified flight controls limitation rotorcraft-helicopter; and • Airplane Category and Single-Engine Land class rating.	To operate an Airplane Category, Single-Engine Land class aircraft with a simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR §§ 61.45(h)(1) and 61.31(l)(1).

Rotorcraft-Helicopter			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Recreational pilot certificate or higher with a rotorcraft category and helicopter class rating without a simplified flight controls limitation.	with simplified flight controls designation at the same certificate	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.31(1).

Airplane Single-Engine Land (ASEL) or Airplane Single-Engine Sea (ASES)			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Sport pilot certificate with the following: • ASEL privileges; and • Specific make and model (M/M) simplified flight controls limitation.	To operate a different M/M of ASEL aircraft with simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(1) for each M/M.	Title 14 CFR § 61.45(h)(1).
Sport pilot certificate with the following: • ASES privileges; and • Specific M/M simplified flight controls limitation.	To operate a different M/M of ASES aircraft with simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.45(h)(1).
Sport pilot certificate with the following: • ASEL privileges; and • Specific M/M simplified flight controls limitation.	A recreational pilot certificate or higher with ASEL rating (with or without a simplified flight controls designation).	The applicable requirements for that grade of certificate, including a practical test.	Title 14 CFR part 61 applicable subpart, and subject to 14 CFR § 61.9.
Sport pilot certificate with the following: • ASES privileges; and • Specific M/M simplified flight controls limitation.	A recreational pilot certificate or higher with ASES rating (with or without a simplified flight controls designation).	The applicable requirements for that grade of certificate, including a practical test.	Title 14 CFR part 61 applicable subpart, and subject to 14 CFR § 61.9.

Airplane Single-Engine Land (ASEL) or Airplane Single-Engine Sea (ASES)			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Sport pilot certificate with the following: • ASEL privilege (or ASES privilege); and • Specific M/M simplified flight controls limitation for airplane.	To operate a rotorcraft-helicopter category and class aircraft with simplified flight controls designation as an initial applicant for rotorcraft category and helicopter class at any certificate grade.	A practical test for that certificate (if applicable), category, and class of aircraft.	Title 14 CFR § 61.45(h)(2) and the applicable certificate requirements.
Sport pilot certificate with the following: • ASEL privilege (or ASES privilege); and • Specific M/M simplified flight controls limitation for airplane.	To operate any rotorcraft or airplane category without simplified flight controls designation at the same certificate level.	A practical test for that category and class of aircraft.	Title 14 CFR §§ 61.45(h)(2) and 61.316.
Sport pilot certificate with the following: • ASEL privilege (or ASES privilege); and • Specific M/M simplified flight controls limitation for airplane.	To operate a different category and class, other than rotorcraft-helicopter category, at the same certificate level.	A proficiency check.	Title 14 CFR § 61.321.
Recreational pilot certificate or higher with the following: • ASEL rating; and • Specific M/M simplified flight controls limitation.	To operate a different M/M of ASEL aircraft with a simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.45(h)(1).
Recreational pilot certificate or higher with the following: • ASES rating; and • Specific M/M simplified flight controls limitation.	To operate a different M/M of ASES aircraft with a simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.45(h)(1).

Airplane Single-Engine Land (ASEL) or Airplane Single-Engine Sea (ASES)			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Recreational pilot certificate or higher with the following: • ASEL rating; and • Specific M/M simplified flight controls limitation.	To operate an ASES aircraft with a simplified flight controls designation at the same certificate level.	A practical test for that category and class of aircraft.	Title 14 CFR § 61.45(h)(2) and the applicable certificate requirements.
Recreational pilot certificate or higher with the following: • ASEL rating; and • Specific M/M simplified flight controls limitation.	To operate an ASEL aircraft without a simplified flight controls designation at the same certificate level.	A practical test for that category and class of aircraft equipped with conventional flight controls.	Title 14 CFR § 61.45(h)(2).
Recreational pilot certificate or higher with the following: • ASES rating; and • Specific M/M simplified flight controls limitation.	To operate an ASES aircraft without a simplified flight controls designation at the same certificate level.	A practical test for that category and class of aircraft equipped with conventional flight controls.	Title 14 CFR § 61.45(h)(2).
Recreational pilot certificate or higher with the following: • ASEL rating (or ASES rating); • Specific M/M simplified flight controls limitation for airplane; and • Rotorcraft-helicopter rating.	To operate a rotorcraft-helicopter with a simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR §§ 61.45(h)(1) and 61.31(l)(1).
Recreational pilot certificate or higher with the following: • ASEL rating (or ASES rating); and • Specific M/M simplified flight controls limitation for airplane.	To operate a rotorcraft-helicopter with a simplified flight controls designation at the same certificate level.	The requirements to add another category and class rating on the applicable pilot certificate, including a practical test.	Title 14 CFR §§ 61.45(h)(2) and 61.63(b).

Airplane Single-Engine Land (ASEL) or Airplane Single-Engine Sea (ASES)			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Recreational pilot certificate or higher with an ASEL rating without a simplified flight controls limitation.	To operate an ASEL aircraft with simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.31(l).
Recreational pilot certificate or higher with an ASES rating without a simplified flight controls limitation.	To operate an ASES aircraft with simplified flight controls designation at the same certificate level.	The training and endorsement required by 14 CFR § 61.31(l) for each M/M.	Title 14 CFR § 61.31(l).

Flight Instructors Other Than Flight Instructors With a Sport Pilot Rating (14 CFR Part 61 Subpart H)			
If you hold a—	And you are seeking—	Then you must meet the following requirements:	Regulatory Reference
Commercial Pilot Certificate (or Airline Transport Pilot (ATP) Certificate) with rotorcraft category and helicopter class rating.	To provide initial flight instructor cadre training in a helicopter with a simplified flight controls designation.	 Receive a flight instructor certificate with a rotorcraft-helicopter rating; Receive and log model-specific training in that aircraft from an instructor pilot for the manufacturer of the aircraft; and Receive a logbook or training record endorsement from the instructor pilot certifying that the flight instructor is proficient in the safe operation of that model-specific aircraft and the associated simplified flight controls. 	Title 14 CFR § 61.195(n).

Flight Instructors Other Than Flight Instructors With a Sport Pilot Rating (14 CFR Part 61 Subpart H)			
If you hold a—	And you are seeking—	Then you must meet the following requirements:	Regulatory Reference
Flight instructor certificate with rotorcraft category and helicopter class rating issued under 14 CFR part 61 subpart H.	To provide initial flight instructor cadre training in a helicopter with a simplified flight controls designation.	(1) Receive and log model-specific training in that aircraft from an instructor pilot for the manufacturer of the aircraft; and (2) Receive a logbook or training record endorsement from the instructor pilot certifying that the flight instructor is proficient in the safe operation of that model-specific aircraft and the associated simplified flight controls.	Title 14 CFR § 61.195(n).
Flight instructor certificate with rotorcraft category and helicopter class rating issued under 14 CFR part 61 subpart H.	To provide training in a helicopter with a simplified flight controls designation.	Receive training and an endorsement specified in 14 CFR § 61.31(1).	Title 14 CFR § 61.195(m).
Flight instructor certificate with rotorcraft category and helicopter class rating issued under 14 CFR part 61 subpart H.	To instruct under 14 CFR part 61 subpart K in an airplane with simplified flight controls designation.	Complete a practical test for that category and class privilege.	Title 14 CFR § 61.419.

Flight Instructor With a Sport Pilot Rating (14 CFR Part <u>61</u> Subpart <u>K</u>)			
If you hold a—	And you are seeking—	Then you must complete—	Regulatory Reference
Flight instructor certificate with the following: • Sport pilot rating with a rotorcraft-helicopter privilege; and • Specific make and model (M/M) simplified flight controls limitation.	To provide instruction in another M/M of rotorcraft-helicopter with a simplified flight controls designation.	The training and endorsement requirements specified in 14 CFR § 61.31(1) for each M/M.	Title 14 CFR §§ 61.31(l), 61.415(m), and 61.429(d).
Flight instructor certificate with the following: • Sport pilot rating with a rotorcraft-helicopter privilege; and • Specific M/M simplified flight controls limitation.	To provide training in an Airplane Single-Engine Land (ASEL) or Airplane Single-Engine Sea (ASES) with simplified flight controls designation.	A practical test for that category and class privilege.	Title 14 CFR § 61.419(e).
Flight instructor certificate with the following: • Sport pilot rating with ASEL privilege; and • Specific M/M simplified flight controls limitation.	To provide training in an ASEL without a simplified flight controls designation.	A practical test for that ASEL aircraft equipped with conventional flight controls.	Title 14 CFR § 61.45(h)(2).
Flight instructor certificate with the following: • Sport pilot rating with ASEL privilege; and • Specific M/M simplified flight controls limitation.	To provide training in other privileges than airplane or helicopter.	A proficiency check.	Title 14 CFR § 61.419.

Advisory Circular Feedback Form

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by contacting the General Aviation and Commercial Division at 9-AFS-800-Correspondence@faa.gov or the Flight Standards Directives Management Officer at 9-AWA-AFB-120-Directives@faa.gov.

Subject: AC 61-146, Pilot Certification and Operations for Sport Pilots, Flight Instructors with a Sport Pilot Rating, and Simplified Flight Controls

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Recommend paragraph		be changed as follows
In a future change to this AC, p (Briefly describe what you wan	t added.)	g subject:
Other comments:		