



U.S. Department  
of Transportation  
Federal Aviation  
Administration

# Advisory Circular

**Subject:** FAA-Approved Aircraft Dispatcher  
Certification Courses

**Date:** 11/5/24

**AC No:** 65-34A

**Initiated by:** AFS-200

**Change:** 1

**1. PURPOSE OF THIS ADVISORY CIRCULAR (AC).** This AC provides standards and guidelines for obtaining approval of and for operating Aircraft Dispatcher Certification Courses, which are approved by the Federal Aviation Administration (FAA), in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part [65](#) subpart [C](#). This AC also provides information that could be useful for individuals seeking FAA certification as an aircraft dispatcher. This guidance is not legally binding in its own right and will not be relied upon by the FAA as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance is voluntary only, and nonconformity will not affect rights and obligations under existing statutes and regulations.

**2. PRINCIPAL CHANGES.** This change incorporates information from 14 CFR part [3](#) subpart [C](#), requiring any individual who has a foreign address and no U.S. physical address of record on file with the FAA to designate a U.S. agent for service if they apply for a certificate, rating, or authorization issued under 14 CFR part [47](#), [61](#), [63](#), [65](#), [67](#), or [107](#) or hold a certificate, rating, or authorization issued under any of these parts. This change also adds a reference showing where to find information on how to designate a U.S. agent for service.

## PAGE CONTROL CHART

Remove Pages	Dated	Insert Pages	Dated
Page ii	2/3/22	Page ii	11/5/24
Pages 5 and 6	2/3/22	Pages 5 and 6	11/5/24
Page 24	2/3/22	Page 24	11/5/24

Robert M. Ruiz for  
Lawrence Fields  
Executive Director, Flight Standards Service



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

# Advisory Circular

---

**Subject:** FAA-Approved Aircraft Dispatcher  
Certification Courses

**Date:** 2/3/22

**AC No:** 65-34A

**Initiated by:** AFS-200

**Change:**

This advisory circular (AC) provides standards and guidelines for obtaining approval of and for operating Aircraft Dispatcher Certification Courses, which are approved by the Federal Aviation Administration (FAA), in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part [65](#) subpart [C](#). This AC also provides information that could be useful for individuals seeking FAA certification as an aircraft dispatcher. This guidance is not legally binding in its own right and will not be relied upon by the FAA as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance is voluntary only, and nonconformity will not affect rights and obligations under existing statutes and regulations.

## CONTENTS

Paragraph	Page
1. Purpose of This Advisory Circular (AC) .....	1
2. Audience .....	1
3. Where You Can Find This AC.....	1
4. What This AC Cancels.....	1
5. Regulatory Foundation for This AC .....	1
6. Terminology Used in This AC.....	1
7. Background .....	2
8. The Purpose of an Aircraft Dispatcher Certification Course.....	3
9. General Eligibility Requirements for Certification as An Aircraft Dispatcher .....	3
10. Applicants for an Aircraft Dispatcher Certificate Who Meet All of the Eligibility Requirements .....	4
11. Applicants for an Aircraft Dispatcher Certificate Who Are Under the Age of 23 .....	5
12. Part 65 Requirements That Apply to Aircraft Dispatcher Certification Courses .....	6
13. Course Operator Application Requirements .....	6
14. The TCO .....	10
15. Instructors .....	11
16. Training Facilities .....	12
17. Equipment and Materials .....	13
18. Guidelines for Granting Credit for Previous Experience or Training.....	14
19. Distance Learning .....	16
20. Regulatory Foundation for Computer-Based Training .....	17
21. Standards for Computer-Based Training Provided Outside of the Classroom Environment .....	17
22. Aircraft Dispatcher Certification Courses Embedded in Collegiate Programs .....	20
23. Course Operator Recordkeeping Requirement .....	21
24. FAA Approval .....	22
25. Denial of Approval .....	23
26. Course Operator Initiated Cancellation of Approval .....	23
27. Withdrawal of FAA Approval .....	23
28. Change in Ownership, Name, or Location.....	24
29. Questions About This AC .....	24
30. Regulatory References .....	24
31. Related Reading Material (current editions).....	24
32. AC Feedback Form .....	25

**1. PURPOSE OF THIS ADVISORY CIRCULAR (AC).** This AC provides standards and guidelines for obtaining approval of and for operating Aircraft Dispatcher Certification Courses, which are approved by the Federal Aviation Administration (FAA), in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part [65](#) subpart [C](#). This AC also provides information that could be useful for individuals seeking FAA certification as an aircraft dispatcher. This guidance is not legally binding in its own right and will not be relied upon by the FAA as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance is voluntary only, and nonconformity will not affect rights and obligations under existing statutes and regulations.

**2. AUDIENCE.** The primary audience for this AC includes persons seeking approval to operate a part 65 Aircraft Dispatcher Certification Course and individuals seeking FAA certification as an aircraft dispatcher. The secondary audience includes FAA Flight Standards Service (FS) offices, in particular certificate management offices (CMO) and aviation safety inspectors (ASI) assigned oversight and management of FAA-approved Aircraft Dispatcher Certification Courses.

**3. WHERE YOU CAN FIND THIS AC.** You can find this AC on the FAA's website at [https://www.faa.gov/regulations\\_policies/advisory\\_circulars](https://www.faa.gov/regulations_policies/advisory_circulars) and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>.

**4. WHAT THIS AC CANCELS.** AC 65-34, FAA-Approved Aircraft Dispatcher Certification Courses, dated October 11, 2017, is canceled.

## **5. REGULATORY FOUNDATION FOR THIS AC.**

**a. Statutory Authority to Prescribe Standards.** The FAA's statutory authority for promoting safety by prescribing regulations and minimum standards is contained in Title 49 of the United States Code (49 U.S.C.) § [44701](#).

**b. Regulatory Requirements of Part 65, Including Appendix A.** The standards set forth in this AC are based on the regulatory requirements of part 65 subparts [A](#) and C, and appendix [A](#).

## **6. TERMINOLOGY USED IN THIS AC.**

**a. Approving Office.** The FS office that approves and manages an Aircraft Dispatcher Certification Course will be referred to as the approving office.

**b. Dispatch Course Program Manager (DCPM).** The individual within the FAA who is assigned the duties associated with the approval and management of an Aircraft Dispatcher Certification Course will be referred to as the DCPM. Course management includes approval (initial and/or renewal) as well as ongoing oversight.

## 7. BACKGROUND.

**a. Regulatory History.** In July of 1940, the regulations governing the requirements for the issuance of Aircraft Dispatcher Certificates were established in the Civil Air Regulations (CAR) part 27, Aircraft Dispatcher Certificates. At that time, CAR part 27 defined an aircraft dispatcher as “An individual holding a valid aircraft dispatcher certificate issued by the Administrator who exercises responsibility with the pilot in command in the operational control of each flight.” In August of 1962, 14 CFR part 65 was codified to set forth the rules pertaining to the certification of airmen other than flightcrew members. CAR part 27 was removed and the regulations applicable to the certification of aircraft dispatchers were moved to Part 65 Subpart C, Aircraft Dispatchers. Since the establishment of part 65 in 1962, the regulations pertaining to the certification of aircraft dispatchers have been amended once, in December 1999. The final rule, Revision of Certification Requirements: Aircraft Dispatchers, 64 FR 68916 (December 8, 1999), is contained in public docket number FAA-1998-4553, which can be accessed at <https://www.regulations.gov>.

**b. The Role of a Certificated Aircraft Dispatcher.** In accordance with part 65, § [65.51](#), a person acts as an aircraft dispatcher by exercising responsibility with the pilot in command (PIC) in the operational control of a civil aircraft involved in air commerce. Title 14 CFR part [121](#) contains requirements that apply to operational control and the use of certificated aircraft dispatchers. In particular, part 121, §§ [121.395](#), [121.593](#), and [121.595](#) require FAA-certificated aircraft dispatchers for U.S. air carriers who conduct part 121 domestic and/or flag operations. No other regulatory part contains this requirement. Therefore, only a person who is employed by a U.S. air carrier and exercising responsibility with the PIC in the operational control of that carrier’s part 121 domestic and/or flag flights is actually performing the role of an aircraft dispatcher.

**(1) Dispatching Authority.** Every day, thousands of flights are operated by U.S. air carriers, both within the U.S. National Airspace System (NAS) and throughout the world. For U.S. carriers conducting part 121 domestic and flag operations, these flights may not start unless an aircraft dispatcher specifically authorizes the flights. This is referred to as dispatching authority and is mandated by §§ [121.593](#) and [121.595](#).

**(2) Operational Control.** In accordance with 14 CFR part [1](#), § [1.1](#), operational control, with respect to a flight, means “the exercise of authority over initiating, conducting or terminating a flight.” In part 121 domestic and flag operations, as set forth in §§ [121.533](#) and [121.535](#), operational control is a responsibility shared by the aircraft dispatcher and the PIC. In accordance with these rules, every part 121 domestic and flag flight is planned, released, and monitored by a certificated aircraft dispatcher. Unlike the PIC, who has final authority and responsibility for the operation and safety of the flight they are operating at any given moment, the aircraft dispatcher is typically responsible for multiple flights simultaneously and is sharing operational control responsibility for each of those flights together with the PIC. Aircraft dispatchers are often performing preflight planning duties while monitoring multiple flights that are en route.

**(3) Safety of Flight.** Part 121 subparts [T](#) and [U](#) contain the majority of the regulations that set forth the primary duties and responsibilities of an aircraft dispatcher. These duties and

responsibilities directly affect the safety of flight. In addition to dispatching authority and the joint responsibility for operational control discussed earlier in this AC, some other significant aircraft dispatcher duties and responsibilities are listed below:

- (a) Emergency authority (§ [121.557](#)).
- (b) Becoming thoroughly familiar with weather conditions prior to releasing a flight (§ [121.599](#)).
- (c) Providing the PIC with information affecting the safety of flight (§ [121.601](#)).
- (d) Dispatch release and attesting to the belief that a flight can be made with safety (§ [121.663](#)).

## **8. THE PURPOSE OF AN AIRCRAFT DISPATCHER CERTIFICATION COURSE.**

Section [65.57](#) sets forth the experience or training requirements an applicant must meet to qualify for an Aircraft Dispatcher Certificate. The purpose of an FAA-approved Aircraft Dispatcher Certification Course is to provide the applicant with the necessary training to meet the requirements of § 65.57(b), when an applicant lacks the aeronautical experience required by § 65.57(a).

**9. GENERAL ELIGIBILITY REQUIREMENTS FOR CERTIFICATION AS AN AIRCRAFT DISPATCHER.** Individuals seeking an FAA Aircraft Dispatcher Certificate must meet the eligibility requirements of part 65 subpart C. Aircraft Dispatcher Certification Course operators should verify that students meet these requirements. In accordance with § [65.53\(b\)](#), the eligibility requirements for an Aircraft Dispatcher Certificate are as follows:

**a. Minimum Age.** To be eligible for an Aircraft Dispatcher Certificate, a person must be at least 23 years of age.

**b. English Language Requirement.** To be eligible for an Aircraft Dispatcher Certificate, a person must be able to read, speak, write, and understand the English language. The current edition of AC [60-28](#), FAA English Language Standard for an FAA Certificate Issued Under 14 CFR Parts 61, 63, 65, and 107, contains guidance related to English language skills for aircraft dispatchers certificated under part 65.

**c. Pass the Aircraft Dispatcher Knowledge Test (ADX Knowledge Test).** To be eligible for an Aircraft Dispatcher Certificate, a person must pass the ADX Knowledge Test as outlined in § [65.55](#). The ADX Knowledge Test is a computerized test. The test is administered at an Airman Knowledge Testing (AKT) center. Information related to AKT centers can be found on the FAA's official website at [www.faa.gov](http://www.faa.gov), under "Training & Testing" in the "Pilots & Airmen" tab. To access the information, select "Airman Testing." Once on the Airman Testing page, click on the link for "Knowledge Testing." Upon completion of the ADX Knowledge Test, a person will be issued an official Airman Knowledge Test Report by the AKT center.

**(1)** Section 65.53(a) requires a person to be at least 21 years of age to take the ADX Knowledge Test.

(2) Section 65.55(b) requires an applicant for an Aircraft Dispatcher Certificate to present documentary evidence satisfactory to the Administrator of having passed the ADX Knowledge Test within the preceding 24 calendar-months.

**NOTE: Special Federal Aviation Regulation (SFAR) [100-2](#) provides relief for those eligible U.S. military and civilian personnel to present an expired written test to show eligibility to take the Aircraft Dispatcher Practical Test required under part 65 for up to 6 calendar-months after returning to the United States or the termination of SFAR 100-2, whichever is earlier.**

**d. Pass the Aircraft Dispatcher Practical Test.** To be eligible for an Aircraft Dispatcher Certificate, a person must pass the Aircraft Dispatcher Practical Test, as required by § [65.59](#). The practical test is administered either by an Aviation Safety Inspector—Aircraft Dispatch (ASI-AD) or a Designated Aircraft Dispatcher Examiner (DADE). The Aircraft Dispatcher Practical Test will be based on any one type of large aircraft used in air carrier operations. To pass the practical test, the applicant must demonstrate skill in applying the areas of knowledge and topics specified in part 65 appendix A to preflight, as well as all phases of flight, including abnormal and emergency procedures.

**e. Meet the Experience or Training Requirements.** An applicant for an Aircraft Dispatcher Certificate must meet the experience of § 65.57(a) or the training requirements of § 65.57(b). The training requirements of § 65.57(b) are met upon graduation from an FAA-approved Aircraft Dispatcher Certification Course. In accordance with § [65.70\(b\)](#), a graduation certificate from an Aircraft Dispatcher Certification Course is valid for 90 days from course completion. The validity of a graduation certificate may be extended for up to an additional 90 days, provided the course operator is able to determine that the applicant remains proficient in the subject areas listed in part 65 appendix A.

**f. Meet the Skill Requirements.** The skill requirements for an Aircraft Dispatcher Certificate are met when an applicant for an Aircraft Dispatcher Certificate passes the Aircraft Dispatcher Practical Test required by § 65.59.

**NOTE: A U.S. Aircraft Dispatcher Certificate cannot be issued on the basis of a foreign certificate or license. This is because there is no provision in part 65 subpart C that allows for the issuance of a U.S. Aircraft Dispatcher Certificate based on a certificate or license issued by a foreign State. A provision of this nature does exist in other regulatory parts such as 14 CFR parts [61](#) and [63](#) (refer to §§ [61.75](#) and [63.42](#)), but not in part 65.**

**10. APPLICANTS FOR AN AIRCRAFT DISPATCHER CERTIFICATE WHO MEET ALL OF THE ELIGIBILITY REQUIREMENTS.** An applicant who passes the ADX Knowledge Test and the Aircraft Dispatcher Practical Test and meets all of the other eligibility requirements of § 65.53(b) is entitled to an FAA-issued Aircraft Dispatcher Certificate. In accordance with § [65.13](#), the FAA will issue a temporary Aircraft Dispatcher Certificate to an applicant who presents satisfactory documentation of eligibility and appropriate identification. Appropriate identification contains information to ensure an applicant's identity and eligibility to obtain the requisite certificate. Therefore, such identification must demonstrate



the applicant's identity and age by including the applicant's name, photograph, date of birth, and signature. Acceptable forms of identification include the following: driver's license issued by a U.S. state or territory, U.S. government identification card, U.S. military identification card, or passport or alien residency card.

**NOTE: Applicants with a foreign address for official record purposes must comply with the U.S. agent for service requirements in 14 CFR part 3 subpart C, which require any individual who has a foreign address and no U.S. physical address of record on file with the FAA to designate a U.S. agent for service if they apply for a certificate, rating, or authorization issued under 14 CFR part 47, 61, 63, 65, 67, or 107 or hold a certificate, rating, or authorization issued under any of these parts. To designate a U.S. agent for service, applicants should refer to AC 3-1, U.S. Agents for Service on Individuals with Foreign Addresses Who Hold or Apply for Certain Certificates, Ratings, or Authorizations.**

**11. APPLICANTS FOR AN AIRCRAFT DISPATCHER CERTIFICATE WHO ARE UNDER THE AGE OF 23.** As previously stated in this AC, to be eligible for an Aircraft Dispatcher Certificate, a person must be at least 23 years of age, although a person could be as young as 21 years of age when taking the ADX Knowledge Test. An applicant who is at least 21 years of age and who has passed the ADX Knowledge Test may take the Aircraft Dispatcher Practical Test. However, due to the minimum age requirement for an Aircraft Dispatcher Certificate, applicants who take a practical test prior to reaching 23 years of age are not entitled to the certificate itself. When an applicant under the age of 23 passes the Aircraft Dispatcher Practical Test, the FAA will issue a Letter of Aeronautical Competency, not a Temporary Airman Certificate.

**a. A Letter of Aeronautical Competency Is Not an FAA-Issued Certificate.** A Letter of Aeronautical Competency is not an FAA-issued certificate and there are no regulatory privileges or authority associated with such a letter. The Letter of Aeronautical Competency is simply a written confirmation issued by the FAA that an applicant who is under the age of 23 has passed the Aircraft Dispatcher Practical Test. A person in possession of a Letter of Aeronautical Competency does not qualify for an Aircraft Dispatcher Certificate until reaching their 23rd birthday. Upon reaching that age, the applicant may present the letter to the FAA in order to be issued a Temporary Airman Certificate.

**b. A Letter of Aeronautical Competency Does Not Automatically Convert to a Certificate Upon the Applicant's 23rd Birthday.** The FAA does not actively monitor the birth dates of each applicant who possesses a Letter of Aeronautical Competency; therefore, the issuance of an Aircraft Dispatcher Certificate in exchange for a Letter of Aeronautical Competency is not an automatic process.

**c. The Applicant Must Present the Letter of Aeronautical Competency to an FAA FS Office.** The FAA FS office will issue a temporary Aircraft Dispatcher Certificate to an applicant with a Letter of Aeronautical Competency who has reached their 23rd birthday when the applicant presents that letter to an FS office, along with the appropriate identification to allow the FAA to positively identify the individual. Appropriate identification is discussed in



paragraph [10](#) above. Upon positive identification and validation of the Letter of Aeronautical Competency, the FAA will issue a Temporary Airman Certificate. Upon reaching 23 years of age, a person should exchange the Letter of Aeronautical Competency for a Temporary Airman Certificate as soon as possible. A Letter of Aeronautical Competency does not expire. However, to ensure an expeditious and uncomplicated exchange, a person should plan to present the letter to the FAA to make the exchange within a year after reaching the age of 23.

**NOTE: Applicants with a foreign address for official record purposes must comply with the U.S. agent for service requirements in part 3 subpart C, which require any individual who has a foreign address and no U.S. physical address of record on file with the FAA to designate a U.S. agent for service if they apply for a certificate, rating, or authorization issued under part 47, 61, 63, 65, 67, or 107 or hold a certificate, rating, or authorization issued under any of these parts. To designate a U.S. agent for service, applicants should refer to AC 3-1.**

**d. Aircraft Dispatcher Certification Course Operator Should Inform Students.** Course operators should inform students who are under the age of 23 that they are not entitled to an Aircraft Dispatcher Certificate until they reach 23 years of age. Course operators should also inform students who intend to take the Aircraft Dispatcher Practical Test prior to reaching their 23rd birthday that they will not be issued a Temporary Airman Certificate upon passing that test. Course operators should explain the procedure for exchanging a Letter of Aeronautical Competency for a Temporary Airman Certificate, outlined in subparagraph c above.

**12. PART 65 REQUIREMENTS THAT APPLY TO AIRCRAFT DISPATCHER CERTIFICATION COURSES.** The regulatory requirements that apply to Aircraft Dispatcher Certification Courses are set forth in §§ [65.61](#) through 65.70 and part 65 appendix A. Course operators must also comply with the applicable requirements of part 65 subpart A.

**13. COURSE OPERATOR APPLICATION REQUIREMENTS.** Application requirements for an Aircraft Dispatcher Certification Course are set forth in §§ 65.61 and [65.63](#). The FAA approves each course individually. The application package, including all course documents, should be submitted to the FAA in hard copy format. The submission of electronic documents may also be acceptable, provided it is mutually agreed upon by the FAA approving office and the course applicant/operator. If using electronic course manuals and recordkeeping systems, operators should refer to the standards of the current edition of AC [120-78](#), Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals.

**a. Application for Original FAA Approval to Operate an Aircraft Dispatcher Certification Course.**

**(1) Where to Apply.** An applicant seeking an original FAA approval to operate an Aircraft Dispatcher Certification Course should contact the nearest FS CMO located within the geographic area of the desired course location. Currently, only CMOs are staffed with the necessary technical resources to review an application and approve and manage this type of course. It is important to note that an FS office, including a CMO, is prohibited from accepting an application for original approval of an Aircraft Dispatcher Certification Course if the office

does not have the appropriate technical resources. If a CMO is not staffed to review, approve, and manage an Aircraft Dispatcher Certification Course, the applicant should apply at the next nearest CMO. Potential and existing Aircraft Dispatcher Certification Course operators should review FAA Order [8900.1](#), Volume 3, Chapter 63, Section 2, Approving Office Responsibilities and Assignment of Appropriate Technical Resources, for a better understanding of the FAA's policies related to resources and staffing where Aircraft Dispatcher Certification Courses are concerned. A listing of CMOs is available on the FAA's website at [https://www.faa.gov/about/office\\_org/field\\_offices/cmo/](https://www.faa.gov/about/office_org/field_offices/cmo/).

**(2) Application and Approval Process Completion Time.** Applicants should expect the application and approval process to take no less than 90 days from the date a course applicant submits its application to complete the original approval process for an Aircraft Dispatcher Certification Course. Application packages should be thorough and complete. If the application is deficient in any way, the overall application and approval process could take considerably longer, depending on the extent of the deficiencies.

**b. Application for Renewal of FAA Approval.**

**(1) Submit an Application for Renewal to the Approving Office.** In line with the requirements set forth in § 65.63, existing course operators must submit an application for renewal of FAA approval to the approving office. Section 65.63(c) requires an application for course renewal to be made within 30 days preceding the month the approval expires. The application for renewal must meet all of the requirements of original approval in accordance with § 65.63(a). Renewal of FAA approval will be contingent upon a course operator's ability to meet the requirements prescribed in § 65.63(c), which includes minimum student passing requirements and continued compliance with part 65 subpart C.

**(2) Application and Approval Process Completion Time.** For the purposes of this AC, the 30-day time period preceding the month FAA approval expires is referred to as the renewal window. The intent of the 30-day renewal window is to allow the FAA time to review a course operator's performance and continued qualification for course approval. The approving office, through the DCPM, may conduct regular inspections for the purpose of determining continued qualification and regulatory compliance, in accordance with the Administrator's statutory authority to conduct safety investigations under 49 U.S.C. § [40113](#). During the renewal window, the DCPM may review inspection history along with the application package submitted by the course operator.

**c. Contents of an Application Package for Original Approval and Renewal.**

**(1) Application.** Section 65.63 requires an application for original approval or renewal of approval to be made in writing to the Administrator. New course applicants and existing course operators should submit their request for approval via a letter of intent addressed to the manager of the potential or actual approving office (depending on whether the application is for original or renewed approval).

**(a) Original Approval.** Submit a written request to operate a new Aircraft Dispatcher Certification Course via a letter of intent. The request should include at least the following information:

- The proposed name of the course operator;
- The proposed location of the course training facility;
- The name(s), address, telephone number, and email address of the owner(s) of the course; and
- The proposed date the applicant desires to begin conducting the course.

**(b) Renewal of Approval.** Submit a written request to renew the course approval. The request should include at least the following information:

- The name of the course operator;
- The location of the course training facility;
- The name(s), address, telephone number, and email address of the owner(s) of the course; and
- If the renewal contains any revised material, the revision number and the date on which the revision becomes effective.

**(2) Items Required by § 65.63.** Section 65.63 requires all application packages for original approval and renewal to contain:

- Two copies of the certification course outline (referred to as the TCO in this AC) required under § 65.61(b);
- A description of the training facility and equipment; and
- A list of instructors and their qualifications.

**(3) Instructional Materials (Courseware).** The application package should include the courseware and instructional material developed by the course operator for each subject, topic, and subtopic.

**(4) Sample Written Statement of Graduation.**

**(a)** The application package should include a sample of the written statement of graduation (graduation certificate) the course operator will use. The statement of graduation is required by § 65.70(b).

1. The graduation certificate should include a place for an authorized representative of the course operator to attest to (i.e., via signature) the successful completion of the course by the student to whom the graduation certificate is issued.

2. A graduation certificate is valid for 90 days and may be revalidated for an additional 90 days, as allowed by § 65.70(b). Therefore, the statement of graduation must include the date on which it was issued to the student.

(b) Revalidation criteria. Section 65.70(b) allows an Aircraft Dispatcher Certification Course operator to revalidate a graduation certificate after 90 days, for an additional 90 days, if the course operator determines that the student remains proficient in the subject areas listed in part 65 appendix A. The application package should include the revalidation methods the course operator will use to ensure such student proficiency (e.g., a test). The methods utilized by the course operator must be comprehensive enough to allow the course operator to reasonably establish that the student has in fact remained proficient in all subject areas listed in part 65 appendix A.

**(5) Criteria and Methods for Providing Student Credit for Previous Experience or Training.** If a new course applicant or current course operator intends to provide its students with credit for previous experience or training as allowed by § 65.61(d), the application package should also include the proposed criteria for granting credit, along with method(s) of evaluating a student to determine if credit is warranted. The preferred method of including these criteria is to have them be part of the TCO. However, including the criteria as a separate item within the application package is also acceptable.

**(6) Recordkeeping and Reporting Methods.**

(a) The application package should contain a description of the recordkeeping system used to maintain the student records required by § 65.70. If using an electronic method of recordkeeping, operators should refer to the standards of the current edition of AC 120-78.

(b) The application package should contain a description of the method the new course applicant or current course operator intends to use to transmit the annual report required by § 65.70(a) to be submitted to the approving office no later than January 31 of each year.

**d. Application for Approval of a Course Revision.**

**(1) Submit an Application for Approval of a Course Revision to the Approving Office.** Aircraft Dispatcher Certification Course operators seeking approval of a revision to the TCO, facilities, or equipment must make a request in writing to the approving office in accordance with § 65.63(a) and (d). Proposed revisions of the course outline or the description of facilities and equipment must be submitted in a format that will allow an entire page or pages of the approved outline or description to be removed and replaced by any approved revision. The list of instructors may be revised at any time without request for approval, provided the minimum requirements of § [65.67](#) are maintained and the course operator notifies the approving office in writing.

**(2) Application and Approval Process Completion Time.** The time it takes for the DCPM to review the course revision and coordinate approval with the approving office manager will vary depending upon the extent of the revision. Course operators should expect a revision processing time to be no less than 30 days.

**(3) Contents of an Application Package for Approval of a Course Revision.** An application package for approval of a course revision must include the following:

(a) A written request for approval of the course revision. The request should include the following:

- The name of the course operator;
- The name(s), address, telephone number, and email address of the owner(s) of the course; and
- The revision number and the date on which the revision becomes effective.

(b) For a revision to the TCO, two copies of the revised TCO.

(c) For a revision that applies to the approved facility, a description of the changes in the facility, or if adding or removing a facility, the location of the new facility.

(d) For a revision that applies to the course equipment, a description of the changes to that equipment.

**14. THE TCO.** Section 65.61(b) requires an FAA-approved TCO to describe the major topics and subtopics of the course and provide the number of proposed hours for each topic and subtopic. In addition to these requirements, each TCO should include the following elements:

**a. List of Effective Pages (LEP).** Each TCO should include an LEP that reflects the current date and revision number of each page contained in the TCO.

**b. Methods of Instruction.** A TCO should include a description of the methods of instruction the course operator will use. Instructional methods include, but are not limited to:

- Lecture,
- Computer-based training,
- Discussion,
- Scenario-based training, and
- Demonstration performance.

**c. Student Evaluation Methods.** The TCO should include a description of the course operator's student evaluation methods. The methods should provide an adequate means of assessing and documenting an individual's cognitive skills and overall comprehension of the instruction provided. The desired outcome is that each student will have a solid foundation of knowledge and understanding of the topic and subtopics required by part 65 appendix A. Examples of evaluation methods include, but are not limited to:

- Oral examination,
- Written examination,
- Airplane performance calculations,
- Manual flight planning scenarios, and
- Simulated briefing to the PIC.

**d. Successful Completion Standards.** The TCO should include minimum test score requirements and standards for overall course completion, as well as standards for completion of individual assignments and scenarios.

**e. A Listing of the Maximum Number of Credit Hours.** Where a course incorporates credit hours, a course operator's TCO should specify the maximum number of credit hours proposed for each topic and subtopic. This practice effectively identifies the minimum hours of instruction the course operator intends to provide on any given topic/subtopic, including any credit. It also helps to ensure continued compliance with § 65.61(b).

**15. INSTRUCTORS.** Section 65.67 requires an Aircraft Dispatcher Certification Course operator to have qualified personnel. Well-qualified instructors and quality instruction are critical components of any course. Course operators should be aware that the FAA will conduct surveillance activities designed to monitor instructors to determine the adequacy and quality of instruction.

**a. List of Qualified Instructors.** In accordance with § 65.63(a)(4), a course operator must maintain a current list of their instructors, including a list of qualifications for each instructor. In accordance with the requirements of § 65.63(d), a course operator must notify the approving office in writing of any revision to the list of qualified instructors.

**b. Regulatory Requirements for Instructors.**

**(1) At Least One Instructor Must Hold an Aircraft Dispatcher Certificate.** In accordance with § 65.67(a)(1), each Aircraft Dispatcher Certification Course operator must have at least one instructor who holds an Aircraft Dispatcher Certificate and is available to coordinate all training course instruction.

**(2) Student-to-Instructor Ratio.** In accordance with § 65.67(a)(2), the ratio of students to instructors in a course must not exceed 25 to 1.

**(3) Practical Dispatch Applications.** In accordance with § 65.67(b), the instructor who teaches the Practical Dispatch Applications area of part 65 appendix A must hold an Aircraft Dispatcher Certificate.

**c. Adequate Personnel.** Section 65.67(a)(1) requires each course operator to have "adequate personnel." The FAA construes adequate personnel to mean personnel who have knowledge of the training policies, topics, and subtopics of the Aircraft Dispatcher Certification Course. Instructors should know the course operator's training policies and procedures and how to complete required training forms. Additionally, instructors should be knowledgeable in the specific topics and subtopics of instruction and be able to present the material in a logical, clear, and organized manner.

**d. Use of Courseware and Lesson Plans.** In order to maintain consistency and standardization of instruction, instructors should use the course operator's courseware and follow the applicable lesson plans, guides, or other training aids. This will ensure that the material is properly presented as designed.

**e. Instructors Who are Also DADEs.** A course operator that elects to use a DADE as an instructor should be aware that the FAA generally prohibits a DADE from instructing and examining the same student, with limited exception. (The primary policy governing DADEs can be found in the current edition of FAA Order [8000.95](#), Designee Management Policy, Volume 4, DADE Designee Policy.)

(1) The FAA will not authorize a DADE who is an instructor to also be the recommending instructor (e.g., sign the Instructor's Recommendation block on FAA Form [8400-3](#), Application for an Airman Certificate and/or Rating) for an applicant to whom the DADE is administering the Aircraft Dispatcher Practical Test.

(2) The FAA will not authorize a DADE to examine an applicant if the DADE has administered any portion of the Practical Dispatch Applications area of knowledge training required by part 65 appendix A, section VIII (including all of the topics and subtopics contained therein).

(3) Based on the limitations on a DADE's authority, a course operator that elects to use a DADE as an instructor will need to have at least one additional instructor who holds an Aircraft Dispatcher Certificate any time the DADE instructs and examines the same applicant. This will allow one certificated instructor to administer Practical Dispatch Applications while the other certificated instructor signs the Instructor's Recommendation block.

(4) An applicant seeking original FAA approval of a new Aircraft Dispatcher Certification Course may use a DADE as an instructor. However, a DADE who will also be in a position to administer the Aircraft Dispatcher Practical Test to graduates of the course will be required to wait at least 12 calendar-months after original approval of the course prior to the FAA authorizing that DADE to test the course graduates. Practical testing of applicants for FAA certification is the responsibility of the FAA; therefore, the FAA will determine whether or not there is a need to authorize a DADE in accordance with 14 CFR part [183](#) (as a representative of the Administrator) to test the graduates of the course. The 12-month waiting period will also serve as a demonstration phase for the course operator to show that it has the ability to administer the course in accordance with the requirements of part 65 subpart C. During this time period, successful graduates of the course will be tested by an ASI-AD or by a DADE that is not an instructor for or is otherwise affiliated with the course. After this initial operating period, the DCPM will review the observation data along with the first annual report submitted by the course operator in accordance with § 65.70. If the data shows that authorizing the course operator's instructor as a DADE who tests the graduates of the course is warranted (e.g., the operator shows compliance with part 65 subpart C, and the number of applicants to be tested demonstrates to the FAA that there is a need for a DADE), the FAA will grant the authorization via the DADE's letter of authority (LOA).

**16. TRAINING FACILITIES.** In accordance with § [65.65](#), each FAA-approved Aircraft Dispatcher Certification Course operator must have facilities, equipment, and materials adequate to provide each student the theoretical and practical aspects of aircraft dispatching. In addition, each Aircraft Dispatcher Certification Course training facility, including all training rooms and spaces used, must:



- Be temperature controlled;
- Be lighted;
- Be ventilated;
- Be free from distraction; and
- Conform to all local building, sanitation, and health codes.

**a. Adequate Facilities.** Each course operator's training facilities should provide a safe and clean environment that is conducive to learning. Students should have access to emergency exits and adequate facilities for physiological needs. A course operator should meet all Federal, state, and local requirements that are applicable to the facility. The FAA will determine the adequacy of a training facility based on the following parameters, as required by § 65.65:

**(1) Temperature Controlled.** Each course operator's training facility, including training rooms and spaces, should be maintained at a comfortable temperature.

**(2) Lighted.** Each course operator's training facility, room, and/or space must have adequate lighting.

**(3) Ventilated.** Each course operator's training facility, room, and/or space must have adequate ventilation.

**(4) Free From Distraction.** Each course operator's training facility, room, and/or space should provide a clean and quiet environment that allows each student an unobstructed view of training presentations. Training facilities, rooms, and spaces should be conducive to a student's overall ability to concentrate. Each training facility, room, and/or space must be located so that the students in that facility are not distracted by the instruction conducted in other rooms.

**(5) Conformance with Local Building, Sanitation, and Health Codes.** It is a course operator's responsibility to ensure that the training facility conforms to all local building, sanitation, and health codes.

**b. Adequate Workspace.** Course operators should provide students with adequate workspace, equipment, and materials to complete intricate calculations related to aircraft performance and flight planning. The workspace should provide each student with enough room to properly use all necessary aeronautical charts and reference materials.

**c. Approval to Conduct the Course at an Additional Facility.** All facilities used by an Aircraft Dispatcher Certification Course operator are subject to the requirements of § 65.65. If a course operator desires to administer its approved course at a location other than its currently approved facility, the operator must request approval of a course revision to add the new facility in accordance with § 65.63(d). If the conduct of the course at the new facility is temporary in nature, the course operator should submit another revision removing the course facility after administering the course.

**17. EQUIPMENT AND MATERIALS.** The requirements for training facilities, as set forth in § 65.65, require an FAA-approved Aircraft Dispatcher Certification Course to have equipment

and materials that adequately provide each student the theoretical and practical aspects of aircraft dispatching.

**a. Equipment.** Any equipment used to deliver instruction must be kept in adequate working condition. Examples of instructional equipment include, but are not limited to:

- Audiovisual equipment, such as projectors, microphones, video screens;
- Computers used for computer-based training, including those used in Distance-Computer-Based Training (D-CBT);
- Manual air navigation or flight computers; or
- Protractors and course plotters.

**b. Materials (Courseware).** Each course operator must maintain adequate courseware. This should include keeping it current. Courseware revisions should be appropriately identified by revision number. Courseware itself is not subject to FAA approval; however, courseware must achieve the regulatory training objectives and provide each student the theoretical and practical aspects of aircraft dispatching. All applicants for an Aircraft Dispatcher Certificate must be able to read, speak, write, and understand the English language as required by § 65.53(b)(2). Therefore, courseware should be in the English language and should primarily use the U.S. system of weights and measurements. Course operators should be aware that the DCPM may review and evaluate courseware content during inspections and onsite surveillance to verify continued adequacy. If a DCPM determines courseware to be unacceptable, the DCPM will notify the course operator in writing, provide an explanation of deficiencies, and provide the operator with a reasonable amount of time to make corrections. This time period will typically be set at 30 calendar-days from the time the course operator is notified of the deficiencies. However, if the courseware presents information that is contrary to Federal regulations, it is appropriate for the DCPM to inform the course operator of the need to cease using the courseware immediately and make the necessary corrections prior to reuse. Courseware for an Aircraft Dispatcher Certification Course should contain the following:

- Lesson plans that flow in a logical sequence;
- Instructor guides;
- Audiovisual materials;
- Training manuals;
- Workbooks;
- Aeronautical charts;
- Airplane Flight Manuals (AFM);
- Operations specifications (OpSpec);
- General Operations Manual (GOM);
- The current edition of [FAA-S-8081-10](#), Aircraft Dispatcher Practical Test Standards;
- Handouts; and
- Any other materials used to support the training curriculum.

**18. GUIDELINES FOR GRANTING CREDIT FOR PREVIOUS EXPERIENCE OR TRAINING.** For the purpose of completing an FAA-approved Aircraft Dispatcher Certification Course, § 65.61(d) allows a student to substitute previous experience or training for a portion of

the minimum 200 hours of training required by § 65.61(a)(2). Section 65.61(d) states that the course operator determines the number of hours of credit based on an evaluation of the experience or training to determine if it is comparable to portions of the approved course curriculum. The credit allowed, including the total hours and the basis for it, must be placed in the student's record. The number of hours of instruction should not be reduced through credit as a matter of convenience for the student or the course operator. Quality instruction that is comprehensive in nature ensures a solid foundation of knowledge and helps prepare a student for certification. Solid foundational knowledge is also critical to the performance of duties as an aircraft dispatcher. One of the most significant duties of an aircraft dispatcher is exercising responsibility for operational control, together with the PIC, of air carrier flights operated in accordance with part 121 domestic and flag rules. Although the amount of allowable credit is ultimately determined by the course operator, the FAA recommends utilizing the following guidelines:

**a. Evaluation Criteria for Credit.**

**(1) Previous Experience.** Any credit for previous experience should be based on documentary evidence of the experience gained by the student. Evaluation methods regarding credit based on previous experience should be designed to determine if the student's experience is actually comparable to portions of the approved curriculum.

**(2) Previous Training.** Credit for previous training should be based on training satisfactorily completed by the student at an accredited university or college or at another FAA-approved Aircraft Dispatcher Certification Course.

**(a) Evidence of Satisfactory Completion.** Course operators should have a documented process for assessing training previously completed by a student, in order to meet the requirements of § 65.61(d). The previously completed training should be comparable to portions of the course operator's approved course curriculum in order for a student to obtain credit. Students who desire credit for previous training should provide documentary evidence in the form of transcripts that show what course content and subjects were successfully completed. The course operator in receipt of the transcripts should review them to determine the amount of credit, if any, is warranted. Section 65.61(d) requires a course operator to place the credit allowed, including the total hours and the basis for it, in the student's record; therefore, if credit is awarded based on transcripts, the course operator must include those transcripts as the basis for the credit received. If transcripts are not made available to the course operator, the course operator should have some other method for evaluating competency in accordance with § 65.61(d) (e.g., a comprehensive test). Otherwise, credit should not be granted. Any evaluations and test results must be documented in the student's record to show compliance with § 65.70.

**(b) Failed/Incomplete Subject Areas.** A course operator should not provide credit for subjects that the student previously failed. Course operators are also cautioned against providing credit for subject areas not previously completed by a student.

**b. Providing Full Credit for a Particular Area or Topic Is Not Recommended.** While § 65.61(d) does allow a course operator to determine the number of hours to credit a student, the FAA does not recommend that a course operator provide full credit for a particular topic or

subtopic, even if a student provides a valid transcript indicating successful completion of that topic from an accredited university or college or another FAA-approved Aircraft Dispatcher Certification Course, or can show substantial previous experience. Where previous experience is concerned, the amount of knowledge obtained this way is subjective in nature and could be difficult to measure for its comparability to portions of the approved TCO. Section 65.61(a)(1) requires a course operator to provide instruction that covers all of the areas of knowledge and topics listed in part 65 appendix A. However, the appendix itself states that the order of coverage is at the discretion of the course operator. The intent of part 65 appendix A is to allow flexibility for course operators to develop their own sequence of instruction and provide a certain number of hours for each area of instruction. As a result, Aircraft Dispatcher Certification Courses may vary in methodology, sequence, and the number of instructional hours provided for each area and topic. Therefore, a student transferring from one course to another, or seeking credit based on previous instruction in particular areas or topics, could have gaps in instruction resulting in critical portions of training being missed by the student. This could ultimately result in a less-knowledgeable aircraft dispatcher.

**c. Credit Hours Should Not Exceed One Half of the Hours of Instruction Required by § 65.61(a)(2).** The total number of instruction hours credited to a student should not exceed one half of those set forth in § 65.61(a)(2), which requires a minimum of 200 hours of instruction. This baseline takes into account any gaps in knowledge areas a student may have.

**d. Credit Should Not Be Given for Part 65 Appendix A, Section VIII or Any of the Topics Contained Therein.** The Practical Dispatch Applications area of knowledge is critical and contains topics that are based on decision-making skills, technique, and human factors (HF). Instruction in this area could vary widely from course to course and previous experience in this area is subjective by nature. Therefore, credit should not be given to any student in this particular area of knowledge.

**19. DISTANCE LEARNING.** Distance learning is a non-regulatory term used by the FAA and the aviation industry. Distance learning has been known by other terms such as e-learning, home study, self-guided training, virtual classroom, distributed training, computer-based training, web-based training, etc. As a matter of policy, the FAA has allowed distance learning to be used as an alternative method to classroom training, when appropriate. Any alternative method of training must provide the student with an equivalent or better level of knowledge than what would be gained through traditional classroom training administered by an appropriately qualified instructor.

**a. The FAA's Description of Distance Learning.** The FAA typically describes distance learning as learning that is accomplished by any training method not including an instructor and trainees gathered together in a traditional classroom.

**b. Drawing a Distinction Within the Context of Aircraft Dispatcher Certification Courses.** For the purpose of Aircraft Dispatcher Certification Courses, the FAA is drawing the following distinction:

**(1) Self-Guided Distance Learning.** Distance learning in the form of self-guided learning and/or home study completed by the student and accomplished through correspondence; versus

**(2) Computer-Based Training.** Instruction provided by the course operator as computer-based training delivered through an electronic Learning Management System (eLMS) outside of the classroom environment.

**c. What Qualifies as an Alternative to Classroom Instruction for the Purposes of Compliance with the Requirements of Part 65 Subpart C.**

**(1) Computer-Based Training Qualifies.** Instruction provided by the course operator as computer-based training delivered through eLMS, outside of the classroom environment, qualifies as instruction for the purposes of satisfying the requirements of part 65 subpart C.

**(2) Self-Guided Distance Learning Does Not Qualify.** Distance learning completed by the student in the form of self-guided and/or home study that is accomplished through correspondence does not qualify as instruction, as required by § 65.61(a)(1). The FAA does not believe that this type of self-guided learning provides an equivalent or appropriate alternative to classroom instruction that is provided in person by an appropriately qualified instructor, particularly as a means to prepare a student for initial certification as an aircraft dispatcher. A course operator may use this type of self-guided learning as a means to provide information that is outside of the requirements of the knowledge areas and topics listed in part 65 appendix A. Additionally, a course operator should not provide a student with course credit, in accordance with § 65.61(d), for any previous training in Aircraft Dispatcher Certification Course subject matter, unless the training was provided by an instructor in a traditional classroom, or via computer-based training provided through an eLMS.

**NOTE: Other FAA regulations, such as those located in part 61, do specifically provide for the use of “home study” (e.g., §§ [61.65\(a\)\(3\)](#), [61.96\(b\)\(3\)\(i\)](#), and [61.103\(d\)\(1\)](#)). The absence of such a provision in part 65 indicates that “home study” is not training for the purposes of that part. Where particular language is included in some regulations, but excluded in others, the FAA construes the absence of the language to be deliberate.**

**20. REGULATORY FOUNDATION FOR COMPUTER-BASED TRAINING.** Prior to the 1999 Final Rule (64 FR 68916), part 65 appendix A contained the requirements of TCOs and specified the “classroom” minimum hours required for each subject. In the 1999 Final Rule, the FAA removed the specification of “classroom hours” and revised the language to state, “a minimum of 200 hours of instruction.” The FAA stated in the preamble that a portion of the hours could include hours from computer-based training.

**21. STANDARDS FOR COMPUTER-BASED TRAINING PROVIDED OUTSIDE OF THE CLASSROOM ENVIRONMENT.** For the purposes of this AC, the FAA is establishing the term “Distance-Computer-Based Training” (D-CBT) to describe instruction that is provided by the course operator as computer-based training delivered through an eLMS outside of a classroom environment. Aircraft Dispatcher Certification Courses that are delivered by D-CBT

are subject to the same regulations as traditional classroom courses. Any instruction a course operator provides via D-CBT is subject to the regulatory requirements for content and minimum hours (§ 65.61); application, duration, and other general requirements (§ 65.63); training facilities (§ 65.65); personnel (§ 65.67); and records (§ 65.70).

**a. Requires Approval.** Section 65.63(a)(3) requires an application for original approval or renewal of a course approval to be accompanied by a description of the equipment and facilities to be used in the course. Therefore, when submitting such an application, a course operator who desires to use D-CBT as an alternative to physical classroom instruction must include that delineation in the application. In accordance with § 65.61(b), the application must also include the intended curriculum topics, subtopics, and the associated training modules that will be taught in this manner. When making the delineation in the application of subjects delivered via D-CBT, the course operator should include the following information with the application:

**(1) Training Objectives and Performance Criteria.** The course operator should include the training objectives and performance criteria associated with D-CBT.

**(2) Evaluation Methods.** A course operator should include a description of its methods for evaluating students and validating that each student has met the training and performance objectives for each topic and subtopic administered via D-CBT.

**(3) A Detailed Description of eLMS.** The course operator should include a detailed description of the eLMS it intends to use.

**b. Recommended Standards for an eLMS.** For the purposes of this AC, an eLMS is a system that uses computer-based (e.g., web-based) technology for administering instruction, tracking student progress, and conducting student assessments. A course operator who desires to use D-CBT should have an eLMS along with sufficient procedures and technology to accomplish those tasks effectively and securely.

**(1) Identity Verification.** The eLMS should include controls that ensure that the student of record is the one completing the lessons. The system should have the ability to identify course participants at logon, during navigation of the lessons, and during course assessments (i.e., testing). An example of this kind of control would be software that requires a student to have a unique user name and password that is known only to the student.

**(2) Ensure Student Confidentiality.** The eLMS should have controls that ensure student confidentiality, including the protection of Personally Identifiable Information (PII).

**(3) Knowledge Assessment.** The eLMS should include software that periodically assesses a student's knowledge. Knowledge assessments should include testing following the conclusion of a particular course topic, subtopic, or module. The testing should be designed to validate that training objectives have been met and that the student has gained the required level of knowledge as outlined in the D-CBT and the course operator's performance criteria.

**(4) Student Tracking and Recordkeeping.**

(a) The eLMS should include a method of tracking and recording student participation and completion of the required number of hours for each topic or module.

(b) The eLMS should have a method of tracking and recording student scores on the tests administered within the D-CBT.

(5) **FAA Access.** A course operator should provide the DCPM with access to the eLMS. The course operator may provide this access on a read-only basis. The level of access provided to the DCPM should be sufficient to allow that individual to evaluate the eLMS and the D-CBT content for inspection purposes.

**c. Course Operator Procedures for D-CBT.**

(1) **Prequalifying Students.** Prior to allowing a student to complete a portion of the FAA-approved course via D-CBT, the course operator should have a method of verifying that the student has an adequate environment (quiet, free from distractions, and with enough space for the student to work with materials, such as aeronautical charts, needed to support the training) and the necessary computer equipment and skills to complete the D-CBT portion of the course.

(2) **Student Access to Instructors.** A course operator should provide the student with ready access to the appropriate instructor during normal business hours. The instructor should be available to respond to questions the student may have and to help resolve issues encountered during any portion of the D-CBT.

(3) **Post-D-CBT Knowledge Assessment.** Following a student's completion of the portion of the Aircraft Dispatcher Certification Course delivered via D-CBT, the course operator should assess the student's knowledge through comprehensive testing designed to validate the knowledge the student has gained through D-CBT. The assessment should be conducted in person at the course operator's approved facility by an appropriately qualified instructor.

(4) **Analysis of Assessments and Test Scores.** A course operator should have a method of comparing the test scores of students who received D-CBT for a particular topic with the scores of students who received classroom training on the same topic. The method should include analysis to determine if either method of instruction contains shortcomings when compared to the other.

**d. Instruction Administered via D-CBT.**

(1) **A Portion of the Total FAA-Approved Hours of Instruction.** Section 65.61(a)(2) requires an FAA-approved Aircraft Dispatcher Certification Course to include a minimum of 200 hours of instruction. As discussed in the preamble to the 1999 Final Rule (64 FR 68916), the FAA utilized this language specifically to permit a course to include a portion of those hours as computer-based training. In keeping with the intent of the regulation, the FAA recommends that a course operator offer only a portion of the 200 hours of instruction required by § 65.61(a) via D-CBT. The recommended portion is not more than 50 percent of the total FAA-approved



hours of instruction. This recommendation does not prevent a course operator from requesting approval to administer more than 50 percent of a course via D-CBT.

**(2) Must Provide the Theoretical and Practical Aspects of Aircraft Dispatching.** A course operator may not use D-CBT in areas of knowledge where the characteristics of D-CBT will not provide each student the theoretical and practical aspects of aircraft dispatching, which is the equivalent to what would otherwise be provided in a training facility (refer to § 65.65). Therefore, D-CBT may not be conducive to the training in some areas of knowledge listed in part 65 appendix A.

**(3) Instruction in the Area of Practical Dispatch Applications.** A course operator may not use D-CBT in areas of knowledge where the characteristics of D-CBT will not accomplish the learning objective promulgated by the regulations. An Aircraft Dispatcher Certification Course must provide instruction in the areas of knowledge and topics listed in part 65 appendix A. D-CBT may not be conducive to the training of some areas of knowledge listed in the appendix. For example, the Practical Dispatch Applications areas of knowledge contained in part 65 appendix A, section VIII, which are some of the most critical areas of knowledge for an aircraft dispatcher's duties, contain topics and subtopics that are based on decision-making skills, technique, and HFs. Hands-on instruction and in-person observation of the student training in these areas is necessary to allow the instructor to adequately evaluate the student and measure the effectiveness of the training in real time. Therefore, if the D-CBT does not accomplish the imperative learning objectives in the Practical Dispatch Applications areas of knowledge, the FAA will not approve a course operator to use D-CBT to deliver any instruction in these areas.

**e. Documentation in Student Record.** Section 65.70 requires an Aircraft Dispatcher Certification Course operator to maintain a record for each student that includes a chronological log of instructors and subjects (areas and topics) covered. In order to maintain compliance with § 65.70(a), course operators must list a responsible instructor for each subject administered via D-CBT. Course operators should also clearly document the subjects that were administered via D-CBT. A course operator's eLMS should have a method of student record keeping. However, it is also acceptable for a course operator to retain student records in traditional paper format, provided all of the required information from the D-CBT can be extracted. If student records are to be retained electronically through an eLMS or other electronic system, operators should refer to the standards of the current edition of AC 120-78.

**22. AIRCRAFT DISPATCHER CERTIFICATION COURSES EMBEDDED IN COLLEGIATE PROGRAMS.** Colleges and universities that desire to include an FAA-approved Aircraft Dispatcher Certification Course as part of an academic program must comply with all of the requirements of part 65 subpart C and appendix A. The FAA treats each Aircraft Dispatcher Certification Course as a separate entity for the purposes of course approval, regardless of whether it is embedded in a collegiate program or is operated as a standalone course.

**a. Expected Compliance with Part 65 Subpart C.** Aircraft Dispatcher Certification Courses that are embedded in collegiate programs are expected to comply with the regulations of part 65 subpart C, just as any independent course operator would be required. Historically, challenges have arisen when Aircraft Dispatcher Certification Courses, subject to part 65, are

part of other aviation-related curricula that are not subject to the requirements of part 65. Therefore, when Aircraft Dispatcher Certification Courses are part of a collegiate program, the FAA, as part of their inspection responsibilities, may pay particular attention to the course's compliance with facilities requirements (§ 65.65), certificated instructors requirements (§ 65.67), and student-to-instructor ratio requirements (§ 65.67(a)(2)).

**b. Instruction Requirements.** Instruction that is part of an Aircraft Dispatcher Certification Course, including one embedded in a collegiate program, must be administered in accordance with part 65 subpart C and appendix A. Any instruction administered contrary to these requirements will not qualify towards the minimum hours of instruction required by § 65.61(a)(2).

**(1) Collegiate Instruction That May Be Included in the Minimum Hours Required by § 65.61(a)(2).** Any instruction in the areas, topics, and subtopics required by part 65 appendix A that is administered in accordance with the requirements of part 65 subpart C, including the student-to-instructor ratio of no more than 25 to 1, may be included in the minimum hours of instruction required by § 65.61(a)(2).

**(2) Collegiate Instruction That May Not Be Included in the Minimum Hours, but May Be Considered for Credit as Previous Training in Accordance With § 65.61(d).** Instruction provided in a collegiate program that contains some or all of the required topics and subtopics of part 65 appendix A, but does not meet all of the requirements of part 65 subpart C, may not be included in or counted toward the 200 minimum hours of instruction required by § 65.61(a)(2). However, an Aircraft Dispatcher Certification Course operator may grant a student some credit for successfully completed aviation collegiate program courses that include the topics and subtopics required by part 65 appendix A.

**23. COURSE OPERATOR RECORDKEEPING REQUIREMENT.** Each Aircraft Dispatcher Certification Course operator is required to maintain compliance with the recordkeeping requirements of § 65.70. If a course operator elects to maintain student records in an electronic format, operators should refer to the standards of the current edition of AC 120-78.

**a. Student Records.** Section 65.70(a) requires an Aircraft Dispatcher Certification Course operator to maintain a record for each student.

**(1) Chronological Log.** Each student record must contain a chronological log of all instructors, subjects covered, course examinations, and results. The chronological log applies to subjects covered through D-CBT, and should specify which subjects (e.g., topics, subtopics, modules) were administered via D-CBT.

**(2) Documentation of Student Credit.** As provided in § 65.61(d), a course operator is responsible for determining the number of hours of credit based on an evaluation of the previous experience or training to determine if it is comparable to the course operator's approved curriculum. Course operators who provide student credit for previous experience or training in accordance with § 65.61(d) must clearly and thoroughly document the credit allowed, including the following:

- (a)** The total number of hours of credit provided to the student; and

(b) The basis for any credit provided. Examples of a basis of credit that must be included would be any transcripts or results of evaluations used to determine the amount of credit.

**(3) Record Retention.** The course operator must retain each student record for at least 3 years after the student's graduation from the course.

**b. Annual Report.** Section 65.70(a) requires a course operator to prepare an annual report for its records and for transmission to the approving office. The course operator must transmit the annual report no later than January 31 of each year. Each annual report must contain the following information from the previous year:

- The names of all students who graduated, together with the results of their Aircraft Dispatcher Certification Courses; and
- The names of all of the students who failed or withdrew, together with the results of their Aircraft Dispatcher Certification Courses or the reasons for their withdrawal.

## **24. FAA APPROVAL.**

**a. Original Approval.** When the FAA finds a course operator's application to be acceptable, the FAA will grant approval of an Aircraft Dispatcher Certification Course in writing. Application requirements for original approval are set forth in § 65.63(a) and described in paragraph 13 of this AC. The approving office will approve and sign the TCO LEP and attach it to the approval letter. A course operator should retain each approval letter until it expires, is withdrawn, or is otherwise canceled or superseded. Course operators should make the approval letter available to the Administrator upon request. FAA approval of an Aircraft Dispatcher Certification Course expires on the last day of the 24th month from the month the approval was issued, or on the date that any change in ownership occurs (refer to § 65.63(b)).

**b. Renewal of Approval.** In accordance with § 65.63(c), an Aircraft Dispatcher Certification Course operator must submit an application for course renewal within 30 days preceding the month the approval expires. The application for renewal must meet all of the requirements of original approval in accordance with § 65.63(a). Application requirements for renewal of approval are further outlined in paragraph 13 of this AC. The FAA will renew a course approval in writing. The approving office will approve and sign the TCO LEP and attach it to the approval letter, in the same manner as an original approval. Accordingly, a course operator should retain the approval letter until it expires, is withdrawn, or is otherwise canceled or superseded, and make it available to the Administrator upon request. A renewed FAA approval of an Aircraft Dispatcher Certification Course expires on the last day of the 24th month from the month the renewal of approval was issued. The FAA will renew its approval of an Aircraft Dispatcher Certification Course provided the course operator meets the following requirements:

**(1) Meets Minimum Student Passing Requirements.** As required by § 65.63(c)(1), at least 80 percent of the graduates of the course who applied for and took the practical test required by § 65.59 must have passed the test on their first attempt.

**(2) Continues to Meet Requirements For Approval.** As required by § 65.63(c)(2), the course must continue to meet all of the requirements for course approval.

**(3) The FAA Will Not Renew Approval if the Course Operator Fails to Apply for Renewal.** Failure by the course operator to submit an application for renewal in accordance with the requirements of § 65.63 will result in expiration of the course approval on the last day of the 24th month from the month the approval was issued.

**(4) Inactive Course Operators.** If a course operator remains inactive (i.e., does not have students or conduct classes) throughout a particular approval cycle, which is 24 months, the course operator is still required to maintain compliance with the requirements of part 65 subpart C, as a condition for renewal, as required by § 65.63(c)(2). This includes continuing to prepare the annual report required by § 65.70(a) and transmitting it to the approving office no later than January 31 of each year.

**c. Approval of a Course Revision.** The FAA will approve a course revision in accordance with § 65.63(d). Application requirements for a course revision are contained in paragraph 13 of this AC. The FAA will grant approval of a course revision in writing. Approval of a course revision is considered to be an addendum to the current course approval. Course operators should retain the revision approval as part of the overall course approval until such a time as it is superseded by another revision, the course approval expires, or it is otherwise withdrawn or canceled. Course operators should make revision approval letters available to the Administrator upon request.

**25. DENIAL OF APPROVAL.** The FAA will deny approval of any application for original approval, renewal of approval, or approval of a revision of an Aircraft Dispatcher Certification Course upon the determination that the application is incomplete, insufficient, and/or fails to meet the requirements of part 65 subpart C and/or appendix A. The FAA's guidance to inspectors for denying approval is described in detail in Order 8900.1, Volume, 3, Chapter 63, Section 3, Course Approval and Management. The process generally includes providing the applicant with an opportunity to take corrective action before making a final determination to deny approval.

**26. COURSE OPERATOR INITIATED CANCELLATION OF APPROVAL.** An FAA-approved Aircraft Dispatcher Certification Course operator may request cancellation of its course approval at any time. In accordance with § 65.63(e), the request must be made by letter to the approving office. Upon request by the course operator, the approving office will immediately cancel approval. Once FAA approval has been canceled, the course operator should cease all course activity. Instruction provided to students after course approval is canceled is not FAA approved and will not count as instruction required by § 65.61.

**27. WITHDRAWAL OF FAA APPROVAL.** In accordance with § 65.63(e), failure by a course operator to continue to meet the requirements of part 65 subpart C for the approval or operation of an FAA-approved Aircraft Dispatcher Certification Course is grounds for the FAA to withdraw approval of the course. The FAA's guidance to inspectors for withdrawing approval of an Aircraft Dispatcher Certification Course is outlined in Order 8900.1, Volume 3, Chapter 63, Section 3. In general, the FAA will not withdraw approval until:

- There is sufficient documentary evidence of failure by the course operator to meet regulatory requirements;
- Attempts are made to resolve the issues; and
- The course operator is given notice and an opportunity to take corrective action.

## **28. CHANGE IN OWNERSHIP, NAME, OR LOCATION.**

**a. Change in Ownership (§ 65.63(f)).** If any change in ownership of an Aircraft Dispatcher Certification Course occurs, continued FAA approval of the course is contingent upon the following:

(1) Within 10 days after the date that any change in ownership occurs, the course operator must apply for an appropriate amendment to the original approval or renewal that was based on the previous owner.

(2) No change in the facilities, personnel, or approved Aircraft Dispatcher Certification Course is involved.

(3) A course operator seeking an amendment to the original approval or renewal of a course due to a change in ownership should make an application in writing to the approving office and provide the name, address, telephone number, and email address of the new owner of the course. The FAA will not grant an amendment to an existing course approval based on a change in ownership unless the course operator continues to meet all of the requirements of part 65 subpart C and appendix A.

**b. Change in Name or Location (§ 65.63(g)).** If an Aircraft Dispatcher Certification Course operator changes its name or location, continued FAA approval is contingent upon the course operator notifying the approving office in writing within 10 days after the date of the change.

**29. QUESTIONS ABOUT THIS AC.** If you have questions about the material in this AC or would like to provide feedback, you may contact the Air Transportation Division at 800 Independence Ave. SW, FOB 10A, Room 831, Washington, DC 20591; or by phone at 202-267-8166.

**30. REGULATORY REFERENCES.** Title 14 CFR part 65 subpart A, subpart C, and appendix A.

## **31. RELATED READING MATERIAL (current editions).**

**a. FAA Resources.** Policy regarding the assignment of the necessary FAA resources to approve, renew, or conduct oversight of an FAA-approved Aircraft Dispatcher Certification Course is contained in Order 8900.1, Volume 3, Chapter 63, Section 2.

**b. Approval, Renewal, and Oversight of Aircraft Dispatcher Certification Courses.** Policy specific to approval, renewal, and oversight of part 65 Aircraft Dispatcher Certification Courses is contained in Order 8900.1, Volume 3, Chapter 63, Section 3.

**c. Certification of Aircraft Dispatchers.** Guidance specific to the certification of aircraft dispatchers is contained in Order 8900.1, Volume 5, Chapter 5, Section 10.

**d. Designated Aircraft Dispatcher Examiners (DADE).** Policy specific to managing DADEs and the duties and responsibilities of DADEs is contained in the current edition of Order 8000.95, Volume 4.

**e. English Language Requirements.** The current edition of AC 60-28 contains requirements and guidelines related to English language skills for aircraft dispatchers certificated under part 65.

**f. FS Schedule of Charges Outside the United States.** The current edition of AC [187-1](#) contains a schedule of fees that includes charges for FAA services related to the certification of aircraft dispatchers.

**32. 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.

## 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 Air Transportation Division at 9-AFS-200-Correspondence@faa.gov or the Flight Standards Directives Management Officer at 9-AWA-AFB-120-Directives@faa.gov.

Subject: AC 65-34A CHG 1, FAA-Approved Aircraft Dispatcher Certification Courses

Date: \_\_\_\_\_

*Please check all appropriate line items:*

An error (procedural or typographical) has been noted in paragraph \_\_\_\_\_  
on page \_\_\_\_\_.

Recommend paragraph \_\_\_\_\_ on page \_\_\_\_\_ be changed as follows:

---

---

In a future change to this AC, please cover the following subject:  
(Briefly describe what you want added.)

---

---

Other comments:

---

---

I would like to discuss the above. Please contact me.

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_