

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.419

National Policy

Effective Date:
4/28/17

Cancellation Date:
4/28/18

SUBJ: Military Unmanned Aircraft System Operators Seeking Credit for Military Experience Towards FAA Certificates and Ratings

1. Purpose of This Notice. This notice provides guidance and policy for aviation safety inspectors (ASI) and aviation safety technicians (AST) who conduct pilot certification duties. This notice addresses issues that have been raised concerning military Unmanned Aircraft System (UAS) pilots requesting credit towards FAA certificates and ratings for flight time or flight experience accrued while operating UAS.

2. Audience. The primary audience for this notice includes all ASIs and ASTs who conduct certification functions for pilots and/or have oversight of a designee with a military competency certification (Military Competency Examiners (MCE)) or foreign pilot certification authorization (Foreign Pilot Examiners (FPE)). The secondary audience includes personnel working in the Regulatory Support Division (AFS-600) and the Civil Aviation Registry (AFS-700) and other Flight Standards branches and divisions in the regions and in headquarters.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the Federal Aviation Administration's (FAA) website at <http://fsims.faa.gov>. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Applicability. This notice applies to military UAS pilots who may be seeking credit under Title 14 of the Code of Federal Regulations (14 CFR) part 61, § 61.73 for military UAS experience towards an FAA pilot certificate or rating, or who may be seeking an FAA pilot certificate or rating based on graduation from a military unmanned pilot training program.

5. Background.

a. FAA Remote Pilot Certificate. Under 14 CFR part 107, § 107.12, no person may manipulate the flight controls of a small Unmanned Aircraft System (sUAS) unless:

- (1) The person has a Remote Pilot Certificate with an sUAS rating; or

(2) The person is under the direct supervision of a remote pilot in command (PIC). The person acting as the remote PIC must hold a Remote Pilot Certificate issued under part 107 subpart C.

b. U.S. Military UAS Pilots. The U.S. Armed Forces use various designations for their UAS pilots. Some military UAS pilots are dual-rated (i.e., they have graduated from a military manned aircraft pilot training program and an unmanned pilot training program). Some military UAS pilots have only graduated from an unmanned pilot training program. Although some of the military unmanned pilot training programs contain manned aircraft familiarization curriculum segments, a military UAS pilot trainee does not graduate as a military manned aircraft pilot.

c. Military UAS Pilot Interest in Obtaining FAA Pilot Certificates and Ratings. Flight Standards District Offices (FSDO) report an increased level of interest by military UAS pilots in obtaining FAA pilot certificates and ratings. Some offices have erroneously assumed that § 61.73 allows for military UAS pilots to apply for FAA pilot certificates and ratings based on their military experience.

6. Discussion.

a. Military Pilot Training. Only those persons who graduate from a military manned aircraft pilot training program are eligible for part 61 pilot certificates or ratings under the provisions of § 61.73. Military UAS pilot experience does not qualify for any pilot or flight instructor certificate with an airplane, rotorcraft, glider, lighter-than-air, or powered-lift category rating. FAA regulations do not currently permit the time acquired while operating an unmanned aircraft to be logged to meet the aeronautical experience requirements for FAA certification for manned aircraft or to meet the recency-of-experience requirements of part 61. Manned aircraft flight time accrued in the military during a training course for an unmanned aircraft can count towards the time requirements of part 61 for a certificate or rating (outside of § 61.73), provided it meets the definitions of pilot time and/or flight time, as defined in § 61.51.

b. FAA Instrument Rating. Military UAS experience time does not qualify for an initial instrument rating or an instrument rating to be added to any FAA pilot certificate. There is no provision to do so in § 61.65 or § 61.73.

c. FAA Remote Pilot Certificate. There is no avenue for the issuance of an FAA Remote Pilot Certificate based on military UAS experience. There is no provision to do so in part 61 or 107.

7. Action.

a. ASI/AST Actions:

(1) Do not accept an application for an airman certificate or rating in a manned aircraft under part 61 if the applicant is seeking to credit military UAS experience towards the aeronautical experience requirements.

(2) Do not accept an official U.S. Armed Forces record (to meet the requirements of § 61.73(h)(2)) that shows the person graduated from a U.S. Armed Forces undergraduate pilot training school and received a rating qualification as a remote aircraft pilot.

(3) Only accept an official U.S. Armed Forces record (to meet the requirements of § 61.73(h)(2)) that shows the person graduated from a U.S. Armed Forces undergraduate pilot training school and received a rating qualification as a manned aircraft pilot.

(4) Only accept an official U.S. Armed Forces record showing the person passed a pilot proficiency check and instrument proficiency check (IPC) in an aircraft as a military pilot from a U.S. Armed Forces undergraduate pilot training school (to meet the requirements of § 61.73(h)(3)).

Note: The term “aircraft” is defined in 14 CFR part 1, § 1.1 and does not include any flight simulation training devices (FSTD) (as defined in § 1.1), nor any aviation training devices (ATD), as described in Advisory Circular (AC) 61-136, FAA Approval of Aviation Training Devices and Their Use for Training and Experience.

(5) Do not accept personal logbook entries in place of official records to meet the requirements of § 61.73.

b. Additional Distribution to Designees. This notice should be distributed immediately to all designees who perform these functions on behalf of local FAA field offices.

8. Disposition. We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Airmen Training and Certification Branch (AFS-810) at 202-267-1100.



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