

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.685

National Policy

Effective Date:
12/14/23

Cancellation Date:
12/14/24

SUBJ: Part 135 Checking and Recurrent Flight Training Requirements

- 1. Purpose of This Notice.** This notice revises and clarifies policy for Title 14 of the Code of Federal Regulations (14 CFR) part 135 tests, competency checks, pilot-in-command (PIC) instrument proficiency checks (IPC), and recurrent flight training, and provides additional information for helicopters.
- 2. Audience.** The primary audience for this notice is Principal Operations Inspectors (POI) responsible for the approval and surveillance of part 135 training and qualification programs and aviation safety inspectors (ASI) who conduct part 135, § 135.293(a) tests, § 135.293(b) competency checks, or § 135.297 PIC IPCs. The secondary audience includes Front Line Managers (FLM) and Office Managers (OM); operations inspectors; and Flight Standards (FS) divisions, branches, and offices.
- 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 and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>. Operators and the public can find this notice on the Federal Aviation Administration's (FAA) website at https://www.faa.gov/regulations_policies/orders_notices and DRS.
- 4. Background.** The Air Transportation Division (AFS-200) has received several inquiries about the policy in FAA Order 8900.1, Volume 3, Chapter 19, Section 7, Flightcrew Qualification Curriculum Segments, regarding the maneuvers and procedures required during a § 135.297 PIC IPC in helicopters. As a result of those inquiries and the FS commitment to ensuring policy is based on regulatory requirements to ensure the highest level of safety, AFS-200 conducted a thorough review of the part 135 regulations concerning tests, competency checks, PIC IPCs, and recurrent flight training in coordination with the Office of the Chief Counsel (AGC). As a result of this review, AFS-200 is amending Order 8900.1, Volume 3, Chapter 19, Section 7.
- 5. Discussion.** Changes of note to Order 8900.1, Volume 3, Chapter 19, Section 7 include the following:
 - a. Subparagraph 3-1283C, Section 135.297 Requirements.** The note under subparagraph 3-1283C is rewritten to clarify the substitution allowances contained in §§ 135.293 and 135.351. The note states:

“NOTE: When the § 135.297 check is being used as a substitute for a § 135.293 check, the recurrent training requirements of § 135.351 must still be complied with. The FAA does not allow a double substitution. In other words, one cannot use a § 135.297 check to satisfy the requirements of both §§ 135.293 and 135.351.”

b. Subparagraph 3-1283C2), Operations Requiring Commercial Certificates. This subparagraph is amended as shown below to more closely match the requirements of § 135.297(c)(1)(ii):

“Section 135.297(c)(1) also requires that, for operations requiring a commercial certificate and an instrument rating, the IPC must consist of the procedures and maneuvers required for a Commercial Pilot Certificate with an instrument rating and, if required, for the appropriate type rating.”

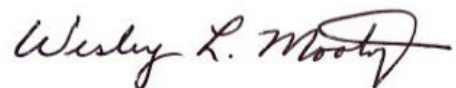
c. Subparagraph 3-1283K, Competency Checks and PIC IPCs Taken Concurrently. The following is added to clarify guidance on checks that are taken concurrently: “If a competency check and a PIC IPC for an aircraft type are completed concurrently during the same flight, all requirements for both the competency check and the PIC IPC must be met. However, if the same maneuver is required for both checks, satisfactory performance of the maneuver can meet the requirement for that aircraft type for both checks simultaneously.”

d. Table 3-70, Part 135 Checking Modules—Airplanes, and Table 3-71, Part 135 Checking Modules—Helicopters. Amendments remove the option for a check pilot or POI to waive holding during the conduct of an IPC in both airplanes and helicopters. In addition, notes are added to the “INST. PROF.” checking column to clarify that certain noninstrument maneuvers are only required when the check is concurrently meeting the requirements of § 135.293.

e. Subparagraph 3-1290A3). Amendments remove unnecessary language and clarify that a check conducted while utilizing night vision goggles (NVG) may satisfy the requirements of § 135.293(b) provided all additional maneuvers listed under visual flight rules (VFR) competency are completed.

6. Action. Within 60 days of the effective date of this notice, POIs must notify their assigned certificate holders (CH) of the revisions to Table 3-71 and the clarified policy applicable to competency checks, PIC IPCs, and recurrent flight training. POIs should also review each assigned operator’s training program to determine compliance with this notice, and notify the operator of any required revisions to training curricula. If a revision to a CH’s training and qualification program is necessary as a result of the revised and clarified policy, POIs should follow the approval process in Order 8900.1, Volume 3, Chapter 19, Section 2, Safety Assurance System: Training and Qualification Program Approval Process.

7. Disposition. We are incorporating the information in this notice into Order 8900.1, Volume 3, Chapter 19, Section 7. Direct questions or comments concerning the information in this notice to AFS-200 at 202-267-8166 or 9-AFS-200-Correspondence@faa.gov.

A handwritten signature in black ink, reading "Wesley L. Mooty". The signature is written in a cursive style with a large, sweeping initial 'W'.

Wesley L. Mooty
Deputy Executive Director, Flight Standards Service