

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.432

National Policy

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8/15/17

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8/15/18

SUBJ: Regulatory Requirement to Provide Enough Flight Instructors and Check Pilots/Check Flight Engineers

- 1. Purpose of This Notice.** This notice provides guidance to principal operations inspectors (POI) with oversight responsibilities for Title 14 of the Code of Federal Regulations (14 CFR) part 119 certificate holders conducting 14 CFR part 121 and/or 14 CFR part 135 operations on regulatory requirements for flight instructors and check pilots/check Flight Engineers (FE).
- 2. Audience.** The primary audience for this notice is Flight Standards District Office (FSDO), Certificate Management Team (CMT), and certificate management office (CMO) aviation safety inspectors (ASI) having oversight of part 121 and certain part 135 certificate holders. The secondary audience includes the Flight Standards (AFS) branches and divisions in the regions and headquarters (HQ).
- 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. Background.** Part 119 certificate holders conducting part 121 and/or part 135 operations are required to provide flight instructors and check pilots/check FEs to support their operational infrastructure. In some cases, certificate holders have not established sufficient numbers of check pilots/check FEs to perform required checks and have been dependent on the FAA to conduct the checks. This notice reaffirms the regulatory obligations imposed on certificate holders with training programs, specifically the need to provide enough qualified instructors and check pilots/check FEs to conduct all checks and other associated duties mandated by applicable regulations.
- 5. Definitions and Regulatory Requirements.**
 - a. Check Airman.** The new terms "check pilot" and "check Flight Engineer" are replacing the older term "check airman" in regulations and guidance and are synonymous with "check airman."

b. Part 121 and Part 135 Regulatory Requirements. Part 121 and part 135 contain the following regulatory requirements:

§ 121.401 Training program: General.	§ 135.323 Training program: General.
<p>(a) Each certificate holder shall:</p> <p>(4) Provide enough flight instructors, simulator instructors, and approved check airmen to conduct required flight training and flight checks, and simulator training courses permitted under this part.</p>	<p>(a) Each certificate holder required to have a training program under § 135.341 shall:</p> <p>(4) Provide enough flight instructors, check airmen, and simulator instructors to conduct required flight training and flight checks, and simulator training courses allowed under this subpart.</p>

6. Discussion. All part 121 air carriers and all part 135 air carriers/operators that are required to have a training program under § 135.341 must provide an adequate number of appropriately qualified personnel to conduct all flight training and checking required under the applicable operating part. It is particularly important that air carriers/operators provide enough line check pilots to perform delegated functions so that FAA inspector resources may be appropriately deployed. POIs should make a determination of what constitutes enough check pilots/check FEs after a consideration of factors, including the number of aircraft and pilots to be checked; and the certificate holder's ability to ensure that each of its designated check pilots/check FEs is fully trained and qualified to perform checking functions.

Note: This notice does not create any restriction on inspector observation of training or checking being performed by the certificate holder, at any time, with or without notice. It also does not restrict the FAA performance of checking functions when, in the judgment of the POI, such performance is necessary or advantageous.

a. Performance of Checking Functions at Multiple Carriers. In some cases, it may be possible for an individual to serve as a check pilot for more than one air carrier/operator at the same time. In all cases, the responsibility remains with the air carrier/operator to ensure that individuals it designates are trained, qualified, and sufficiently active to remain current in that carrier/operator's procedures. For guidance on situations in which a check pilot may conduct checking functions for more than one part 135 air carrier/operator, refer to FAA Order 8900.1, Volume 3, Chapter 20, Section 6, paragraph 3-20-6-23, Approval of a Check Pilot or for Multiple Operators.

b. Training and Qualification. As a basic requirement of certification, each certificate holder described above must develop and submit for approval curriculum(s) to train and qualify flight instructors and check pilots/check FEs in its particular flightcrew member training and qualification program, in accordance with §§ 135.337—135.340 and part 121, §§ 121.411—121.414. Some certificate holders may elect to contract for these services; however, this does not relieve the certificate holder of its responsibility to adequately describe how these personnel will be trained and qualified. POIs must require certificate holders without such currently approved flight instructor and check pilot/check FE training and qualification curriculum(s) to develop and submit such curriculums.

c. Quantity of Flight Instructors and Check Pilots. In addition, certificate holders must ensure that enough flight instructors are qualified, and enough check pilots/check FEs are trained and nominated, so that all training and checking required under the applicable operating part can be conducted by the certificate holder. Certificate holders should not plan to rely on FAA resources to conduct the required checking activities. Certificate holders may request FAA resources (e.g., for a new aircraft type or new check pilots) but are responsible for maintaining an adequate number of flight instructors and check pilots/check FEs for their planned operations.

7. Action.

a. Phase I.

(1) POIs must work with their assigned certificate holders to ensure that those who are required to have flight instructors and check pilots/check FEs have approved curriculum(s) to qualify persons to perform these functions and enough qualified personnel to conduct required flight training and flight checks without reliance upon FAA resources.

(2) Within 30 calendar-days of the issuance of this notice, POIs must inform their assigned certificate holders of the content and intent of this notice. POIs must also notify each certificate holder that does not have required flight instructor and/or check pilot/check FE training and qualification curriculum(s) that a revision to their training program is required in accordance with § 121.405(e) or § 135.325(d). POIs should work with the certificate holder to identify which fleets (if any) do not have enough qualified personnel to conduct required flight training and flight checks without reliance upon FAA resources. If a revision to the training program is not required and the certificate holder has enough qualified personnel to conduct the required flight training and flight checks for all fleets, phases II and III are not required for that certificate holder.

b. Phase II. Within 30 calendar-days of POI notification, the certificate holder will submit a transition plan which outlines how the certificate holder will comply with § 121.401 or § 135.323, as applicable.

c. Phase III. No later than 120 calendar-days after POI notification, the certificate holder must submit any required revision to their training program to include required flight instructor and/or check pilot/check FE training and qualification curriculum(s). POIs must follow the process in Order 8900.1, Volume 3, Chapter 19, Section 2, Safety Assurance System: Training Approval Process, to review and approve, if appropriate, the revised program within 30 calendar-days.

d. Phase IV.

(1) Approval of Check Pilots/Checks FEs. After approval (if required) of the revised training program, the certificate holder must nominate check pilots/check FEs for approval. POIs must follow the process in Order 8900.1, Volume 3, Chapter 20, Section 2, Safety Assurance System: Part 121 Check Pilot and Check Flight Engineer Approval and Surveillance, for approval of part 121 check pilots/check FEs or Order 8900.1, Volume 3, Chapter 20, Section 6, for approval of part 135 check pilots. The check pilot/check FE approval process requires an inspector to observe the candidate check pilot/check FE conducting an actual check. Therefore, the timeframe in which each check pilot/check FE will be nominated may vary depending on the future checking schedule of the certificate holder's pilots. Once the revised training program is approved, the expectation is that the certificate holder will be able to conduct required flight checks as soon as possible without reliance upon FAA resources. Therefore, the certificate holder should train and nominate check pilots/check FEs with consideration of the future checking schedule.

(2) Noncompliance. If a certificate holder does not submit a revision to their training program to comply with the requirements of § 121.401(a)(4) or § 135.323(a)(4) as applicable, or refuses to nominate enough check pilots/check FEs, the POI should withdraw approval of the training program in accordance with Order 8900.1, Volume 3, Chapter 19, Section 2, paragraphs 3-1096, General, and 3-1112, Withdrawing Approval of Training Curricula.

8. Expectation. Paragraph 7 outlines a process and a timeline where there is presently no approved check pilot/check FE training and qualification curriculum(s) and not enough check pilots/check FEs. Timelines are expected to be less when curriculums are in place and the certificate holder simply must nominate a suitable check pilot/check FE, or if certificate holders elect to use a shared check pilot model with other certificate holders.

9. Recording. POIs must record the actions directed by this notice for each assigned part 121 air carrier and part 135 air carrier/operator (except for single-pilot part 135 air carriers/operators and other part 135 air carriers/operators that hold training program deviation authority in accordance with § 135.341(a)).

a. Phases I and II. For each assigned certificate holder, the POI must complete the following:

- (1) Open a Program Tracking and Reporting Subsystem (PTRS) record using code 1380;
- (2) Complete the "Designator" field;

(3) If a revision to the training program is not required and the certificate holder has enough qualified personnel to conduct the required flight training and flight checks, enter “ENOUGH” in the “National Use” field (without quotes);

(4) If a revision to the training program is required or the certificate holder does not have enough qualified personnel to conduct the required flight training and flight checks, enter “NOT” in the “National Use” field (without quotes);

(5) Complete all required and any applicable optional fields;

(6) Enter comments, as appropriate; and

(7) Close the PTRS record with a results code of Completed (C) when the Phase II action by the certificate holder is complete. If phase II is not required, close the PTRS record with a results code of Completed (C) after the Phase I notification is complete.

b. Phase III. For each check pilot/check FE training and qualification curriculum(s) approved as a result of this notice, the POI must:

(1) Open a PTRS record using code 1306;

(2) Complete the “Designator” field;

(3) Complete all required and any applicable optional fields;

(4) Enter “ENOUGH” in the “National Use” field (without quotes);

(5) Enter comments, as appropriate; and

(6) Close the PTRS record with a results code of Completed (C) when the revised training program is approved.

c. Phase IV. For each check pilot/check FE approved as a result of this notice, the POI must:

(1) Open a PTRS record using code 1346 for check pilots and code 1347 for check FEs;

(2) Complete the “Designator” field;

(3) Complete all required and any applicable optional fields;

(4) Enter “ENOUGH” in the “National Use” field (without quotes).

(5) Enter comments, as appropriate; and

(6) Close the PTRS record with a results code of Completed (C) when the phase IV actions are complete.

10. Disposition. We will not incorporate the information in this notice into Order 8900.1. Direct questions concerning the information in this notice to the Air Carrier Training Systems and Voluntary Safety Programs Branch (AFS-280) at 202-267-8166.



John S. Duncan
Director, Flight Standards Service