



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

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

MAY 25 2012
David Cleveland

Dear Mr. Cleveland,

This is in response to your letter dated September 12, 2011, requesting an interpretation on (1) what documentation is required by 14 C.F.R. 61.105 prior to conducting a private pilot practical exam when the applicant has gained the requisite knowledge through a home-study curriculum; (2) what language is required on the 14 C.F.R. 61.103(d) and 61.35(a)(1) endorsement to take a knowledge test and practical exam; and (3) what documentation is required by 14 C.F.R. 61.107 to conduct a private pilot practical exam.

In response to your first question, pursuant to section 61.105, there is no specific documentation required prior to conducting a private pilot practical exam when the applicant has gained the requisite knowledge through a home-study curriculum. Section 61.105(a) states: "A person who is applying for a private pilot certificate must receive and log ground training from an authorized instructor or complete a home-study course on the aeronautical knowledge areas of paragraph (b) of this section that apply to the aircraft category and class rating sought." This section does not set forth any documentation requirements for an applicant who has completed a home-study course on the aeronautical knowledge areas that apply to the aircraft category and class rating sought.

In response to your second question, pursuant to section 61.103(d) and 61.35(a)(1), there are no specific language requirements, only an endorsement requirement. Section 61.103(d) states: "To be eligible for a private pilot certificate, a person must: . . . (d) Receive a logbook endorsement from an authorized instructor who: (1) Conducted the training or reviewed the person's home study on the aeronautical knowledge areas listed in § 61.105(b) of this part that apply to the aircraft rating sought; and (2) Certified that the person is prepared for the required knowledge test." Section 61.35(a)(1) states: "(a) An applicant for a knowledge test must have: (1) Received an endorsement, if required by this part, from an authorized instructor certifying that the applicant accomplished the appropriate ground-training or a home-study course required by this part for the certificate or rating sought and is prepared for the knowledge test. . . ." Thus, to meet the requirements of both section 61.103(d) and section 61.35(a)(1), an applicant must provide a logbook endorsement from an authorized instructor who either conducted the training or reviewed the applicant's home study curriculum that applies to the aircraft rating sought, and the instructor must certify that the

applicant (1) completed the appropriate ground-training or home-study course, and (2) is prepared for the applicable knowledge test.¹

In response to your third question, pursuant to section 61.107, an applicant is required to receive and log flight training from an authorized instructor on the areas of operation provided in section 61.107(b). Section 61.107 states: "(a) General. A person who applies for a private pilot certificate must receive and log ground and flight training from an authorized instructor on the areas of operation of this section that apply to the aircraft category and class rating sought." The regulation requires that the applicant receive and log both ground and flight training from an authorized instructor on the areas listed in the regulations. There is no requirement in the regulations that an instructor must state verbatim each area of study required by section 61.107(b) in the applicant's logbook.

I hope this information has been helpful. This response was coordinated with Flight Standards Service, General Aviation and Commercial Division. If you have further questions concerning this response, please contact Sabrina Jawed on my staff at 202-267-3073.

Sincerely,



Rebecca MacPherson
Assistant Chief Counsel for Regulations, AGC-200

¹ The endorsement provided in FAA Advisory Circular 61.65E fulfills the section 61.35(a)(1) requirement. The endorsement states: "I certify I have reviewed the home study curriculum of (*First name, MI, Last name*). I have determined he/she is prepared for the (*name the knowledge test*). /s/ [date] J. J. Jones 987654321CFI Exp. 12-31-05"