



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

Office of the Chief Counsel

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

AUG 1 2008

Mr. Joshua Wynne
[REDACTED]

Dear Mr. Wynne:

This responds to your letter dated April 6, 2008, requesting an interpretation of section 61.57, Recent flight experience: Pilot in command, Title 14, Code of Federal Regulations, as it pertains to instrument experience. You asked whether a newly rated instrument pilot, one who had just successfully completed a practical test for an instrument rating, would be subject to the recent experience obligations under 61.57(c).

Based upon our interpretation, the answer is no. The six calendar month period described in paragraph (c) begins when a pilot successfully completes his or her practical test. By passing the practical test, the pilot has demonstrated his or her instrument proficiency. In that regard, it is akin to an individual who already holds an instrument rating, but has not met the recent flight experience requirements of 61.57(c) for more than 12 months, completing an instrument proficiency check (IPC) under paragraph (d) of 61.57. Though less extensive than the practical test for issuance of the rating, an IPC likewise is a demonstration of proficiency that starts the clock again for purposes of 61.57(c).

We trust this addresses your concern. This response was prepared by Carol Hattrup, Attorney in the Regulations Division of the Chief Counsel and has been coordinated with the Flight Standards Service Division. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel, Regulations Division