



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

APR 27 2007

Mr. Barry C. Lloyd


Dear Mr. Lloyd,

This responds to your letter dated December 13, 2006, in which you ask three questions concerning the logging of flight time in a helicopter. The answers all flow from the definition of "flight time" found in section 1.1 of Title 14 Code of Federal Regulations.

Your three questions are:

1. May a pilot log as "flight time" to qualify for a certificate or rating under 14 CFR Part 61, or for purposes of qualifying under 14 CFR 135.243(b)(2), that time accrued in a helicopter when the aircraft is sitting on the ground with the engine running and rotor blades turning, but the aircraft has not moved from its parking place and flight has not yet commenced?
2. May a pilot log as "flight time" to qualify for a certificate or rating under 14 CFR Part 61, or for purposes of qualifying under 14 CFR 135.243(b)(2), that time accrued in a helicopter after the end of a flight prior to shut down when the helicopter has set down and come to a rest at its parking place, flight has ceased, but the engine is still running and rotor blades are still turning?
3. If a helicopter is equipped with a "time in service" meter that is actuated only by the collective pitch control, may a pilot add a couple of tenths of an hour of "flight time" to their log book in excess of the aircraft "time in service" meter reading, to account for the time that the aircraft is starting and running up at the beginning of the training period prior to lift off, and that time the engine is idling and cooling down after the last landing, prior to the engine being shut off?

The regulations in pertinent part define "flight time" as "[p]ilot time that commences when an aircraft moves under its own power for the purpose of flight and ends when the aircraft comes to rest after landing." 14 C.F.R. § 1.1. As with fixed-wing aircraft, flight time in a helicopter commences the moment that it moves under its own power away from its parking place for the purpose of flight—whether departure is commenced by lifting off or taxiing. (Helicopters can be equipped with different types of landing gear; and those equipped with wheels or pontoons have the option of a vertical lift-off or taxiing before lift-off.) Flight time ends for any helicopter operation when the helicopter comes to rest after landing.

It follows from the plain words of the regulation that the circumstances you described could not be logged as flight time.

The answer to all three questions is that flight time may not be logged.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca MacPherson", followed by a long horizontal flourish.

Rebecca MacPherson
Assistant Chief Counsel
Regulations Division