Subject: Title 14 of the Code of Federal Regulations (14 CFR) parts 121 and 135 line check airmen surveillance requirements

Purpose: Clarification of terms and surveillance requirements for line check airmen under 14 CFR parts 121 and 135.

Background: Notice 8900.37, published March 12, 2008, included a note intended to clarify the terms “check airman” and “check pilot.” This note made clear that as a matter of Air Transportation Division policy and legal interpretation the term “check airman” is broad and includes both “pilot check airmen” and “check pilot.”

Discussion: Previous informal communication from AFS-200 (in the form of e-mail traffic from approximately 1997) indicated that “pilot check airmen” (referred to in 14 CFR part 121, § 121.440) and line “check pilots” (referred to in 14 CFR part 135, § 135.299) were not required to be observed every 24 calendar-months as required by § 121.413(a)(2) and § 135.339(a)(2). The Air Transportation Division regrets any confusion caused by these messages which were neither universally distributed nor incorporated into formal inspector guidance. Most air carriers, therefore, continued to be in compliance with the regulatory and official guidance requirements for surveillance of check airmen.

Notwithstanding these e-mail messages (which may have given the appearance of creating a new type of check airmen), the six categories of air carrier check airmen are outlined in Order 8900.1, Volume 3, Chapter 20. The first five classifications are all “pilot” check airmen (as opposed to the sixth, “check flight engineer”). All check airmen, and thus pilot check airmen (including those authorized to conduct line checks only), are subject to the initial and recurrent surveillance (observation) requirements outlined in § 121.413(a)(2) and § 135.339(a)(2).

Recommended Action: No person may serve as a part 121 or 135 line check airman unless that person has been observed conducting a proficiency or competency check (i.e., a line check) in an airplane or a simulator within the preceding 24 calendar-months. This observation may be conducted by an FAA inspector or an aircrew program designee employed by the same operator as the line check airman. Directors of operations (or appropriate designees) of operators with line check airmen who are not in compliance with these observation requirements may, however, continue to use such check airmen while working with their POI to develop a schedule for completion of all required check airman observations not later than the date specified in Notice 8900.41. POIs must withdraw check airman approval of any person who has not been observed by that date; Advanced Qualification Program (AQP) participants shall continue to accomplish check airman observations in accordance with their approved Instructor/Evaluator continuing qualification curriculum).

Point of Contact: Questions regarding this InFO may be directed to the Air Carrier Training and 142 Training Center Branch at (202) 493-5259.