



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

# InFO

Information for Operators

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Flight Standards Service  
Washington, DC

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*An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements with relatively low urgency or impact on safety.*

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

**Purpose:** This InFO serves to remind Directors of Operations and Chief Pilots of Title 14 of the Code of Federal Regulations (14 CFR) Part 121 and Part 135 air carriers/operators certified under 14 CFR Part 119 of the regulatory requirement to provide adequate numbers of flight instructors and check pilots/check flight engineers (FE) to conduct required flight training and checks.

**Terminology:** The Federal Aviation Administration (FAA) is replacing the older term “check airman” with the new terms “check pilot” and “check flight engineer” in regulations and guidance. The two terms may be considered interchangeable.

**Background:** Part 121 and part 135 contain the following regulatory requirements:

<p><b>§121.401 Training program: General.</b></p> <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><b>§135.323 Training program: General.</b></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>
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**Discussion:** All part 121 air carriers and all part 135 air carriers/operators who 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.

This means, as a fundamental matter, that each carrier/operator described above must, as required by part 121 subpart N and part 135 subpart H, develop and submit for approval curriculums to train and qualify flight instructors and check pilots/check FEs in its particular flightcrew member training and qualification program. Some carriers/operators may elect to contract for these services. However, this does not relieve the carrier/operator from its responsibility to adequately describe how these personnel will be trained and

qualified. Carriers/operators who do not currently have approved flight instructor and check pilot/check FE training and qualification curriculums should work with their respective FAA office for the approval of such curriculums.

Carriers/operators must, as required by §§ 121.401 and 135.323, ensure that enough flight instructors are trained and qualified, and enough check pilots/check FEs trained and nominated, so that all training and checking required under the applicable operating part can be conducted by the carrier/operator. Carriers/operators should not plan to rely on FAA resources to conduct the required checking activities. Carriers/operators may request FAA resources in some limited instances (for example, for a new aircraft type and observation of new check pilots/check FEs) but are responsible for training and maintaining adequate numbers of flight instructors and check pilots/check FEs for their planned operations.

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's/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, see FAA Order 8900.1 Volume 3, Chapter 20, Section 6, paragraph 3-20-6-23.

**Note:** This InFO does not imply any restriction on FAA observation of training or checking being performed by the carrier/operator, at any time, with or without notice. It also does not restrict FAA performance of checking functions when, in the judgment of the FAA, such performance is necessary or advantageous.

**Noncompliance:** If a carrier/operator has need to revise or develop flight instructor and/or check pilot/check FE curriculum(s), but does not submit a revision to their training program, or refuses to nominate enough check pilots/check FEs, to comply with the requirements of § 121.401 (a)(4) or § 135.323 (a)(4) as applicable, the FAA may withdrawal approval of the training program in accordance with FAA Order 8900.1, Volume 3 Chapter 19 Section 2, paragraphs 3-1096 and 3-1112.

**Recommended Action:** All part 119 directors of operations, chief pilots and training managers should immediately review their training and qualification program to ensure that it includes curriculums to train and qualify flight instructors and check pilots/check FEs. If these curriculums do not exist, develop and submit such curriculums for approval.

After these curriculums are approved, each carrier/operator must, as required by part 121 subpart N and part 135 subpart H, ensure that it trains, qualifies and appoints enough flight instructors, and trains, qualifies and nominates enough check pilots/check FEs, to conduct all of the flight training and checking required under the applicable operating part.

**Contact:** Any questions or comments concerning this InFO should be directed to the Air Carrier Training Systems and Voluntary Safety Programs Branch, AFS-280, at (202) 267-8166.