FAA
Aviation Safety

Memorandum

Date:

To: Jeffrey Vincent, Vice President, Air Traffic Services, AJT-0
Glen A. Martin, Vice President, Safety and Technical Training, AJI-0

From: MICHAEL J O'DONNELL
Michael J. O'Donnell, Aviation Safety, Executive Director, Air Traffic Safety Oversight Service, AOV-1

Prepared by: Andrew Mueller, Director, Air Traffic Safety Operations Oversight, AOV-200

Subject: Policy Memorandum for Credential Holders with a Tower Rating for Initial Issuance of a Control Tower Operator (CTO) Certificate

1. Purpose of this Memorandum. The Air Traffic Safety Oversight Service is clarifying that an Air Traffic Control Specialist (ATCS) who has held a Credential with a Tower Rating has met the knowledge requirements listed in 14 CFR §65.35, and the experience requirement listed in 14 CFR §65.39 for the initial issuance of a CTO Certificate.

2. Audience. This memorandum is for organizations and personnel who perform CTO certifications in support of the National Airspace System.

3. Where can I Find This Clarification? This memorandum is available on the FAA website at: https://www.faa.gov/about/office_org/headquarters_offices/avs/offices/aov/credentialing/

4. Explanation of Memorandum. This memorandum is reinforced by the 2014 rulemaking (79 FR 74607) in which the FAA stated that the Credentialing Program encompasses the CTO Program's underlying requirements. This statement implies that the requirements to obtain a Credential with a Tower Rating include those requirements needed to obtain a CTO Certificate with a Facility Rating. Further, requiring an ATCS who previously held a Credential with a Tower Rating to accomplish a written test and obtain six months of experience places an unnecessary burden on that individual by establishing CTO Certificate requirements that are essentially duplicative.

Finally, since the Credentialing Program encompasses the underlying requirements of the CTO Program, issuing a CTO Certificate with a Facility Rating based on the knowledge and experience gained in obtaining the Credential with a Tower Rating will not have an adverse safety impact.

5. **Action.** For applicants using their Credential with a Tower Rating to satisfy the knowledge and practical experience requirements in 14 CFR §65.35 and 14 CFR §65.39, CTO Examiners must include the following with the CTO application:

- A copy of this clarification memorandum;

- The Credential Number from the applicant's Credential with a Tower Rating; and

- The issuing Agency (i.e., US Air Force, FAA) on FAA Form 8400-3, *Application for an Airman's Certificate and/or Rating*.

cc: Brian Throop, Deputy Vice President, Air Traffic Services, AJT-0
David Spencer, Deputy Vice President, Safety and Technical Training, AJI-0
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