



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

Office of the Chief Counsel

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

JUN 30 2016

Mr. William Grannis
[REDACTED]
[REDACTED]

Re: Clarification of Requirements for Logging Cross-country Time to meet aeronautical experience for pilot certificates, 14 CFR §61.1(b)

Dear Mr. Grannis:

This is in response to your letter dated April 6, 2016 in which you requested a legal interpretation of how cross cross-country time to meet aeronautical experience for pilot certificates is to be logged. Specifically, you ask “does one log actual airborne flight time [time acquired during flight, FAR 61.1] during cross country or does one log total pilot time of the flight as defined by FAR 1.1 where pilot time logged is the same as cross country time logged[?]”

When logging cross-country time to meet aeronautical experience requirements for pilot certificates, “flight time” as defined in § 1.1 of Title 14 of the Code of Federal Regulations (14 CFR) should be used. Flight time is defined as (1) [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; or (2) [f]or a glider without self-launch capability, pilot time that commences when the glider is towed for the purpose of flight and ends when the glider comes to rest after landing. 14 C.F.R. § 1.1.

Section 61.1(b) of Title 14 of the Code of Federal Regulations (14 CFR) defines cross-country time for the purpose of meeting different aeronautical experience requirements. In relevant part, it is defined as “time acquired during flight.” In your request, you define “time acquired during flight” as “actual airborne flight time.” Neither § 61.1 nor § 1.1 define the term “time acquired during flight.” However, in the 1997 Final Rule the FAA explained that it expanded the definition of cross-country time “to clarify what *flight time* may be logged as cross-country time for purposes of meeting certain aeronautical experience requirements for the certificates and ratings issued under part 61.” 62 FR 40888 (emphasis added). The FAA’s use of the defined term “flight time” in conjunction with the explanation of the definition of “cross-country time” demonstrates that the FAA’s intent that “flight time” be used when logging cross-country time, despite the use of alternative terminology in the definition. Therefore, when logging cross-country time, “flight time” as defined in 14 CFR § 1.1 should be used.

This response was prepared by Melissa Crain, an attorney in the Regulations Division of the Office of the Chief Counsel and coordinated with the General Aviation and Commercial Division of the Flight Standards Service. If you have any additional questions regarding this matter, please contact my office at (202) 267-3073.

Sincerely,

A handwritten signature in black ink, appearing to read "Lorelei Peter", with a stylized flourish at the end.

Lorelei Peter
Assistant Chief Counsel for Regulations

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April 6, 2016

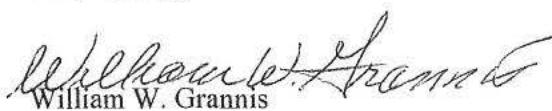
Dear Counsel:

This letter requests interpretation on logging cross country time to meet aeronautical experience for pilot certificates. The request has its genesis in a Facebook aviation discussion group where comments are offered as to whether one logs cross country as PILOT [TOTAL] TIME as defined in FAR 1.1 using airplane Hobbs time, or airborne, cross country time defined in 61.1 as "TIME ACQUIRED DURING FLIGHT— ..." by subtracting tach [ground] time, or an arbitrary time, from the Hobbs time to log cross country time acquired during flight.

1. In one case an instructor at a flight school was instructed to count tach time as cross country time & Hobbs would be total pilot time.
2. A question was proffered asking if there is or is not any regulatory justification for logging legitimate XC time any differently than total flight time.
3. One individual opined the experience where DPEs discount time when they see the cross country time for a flight matching the total Hobbs time for that flight.
4. Another recounted where DPEs walking away from check rides because the student fell short on cross country time after the DPE arbitrarily subtracted "time on the ground" from the Hobbs.
5. Finally, I am unaware of any FAR or FSIMS giving authority to an ASI or DPE to capriciously and arbitrarily remove 0.2 hours or any other subjective time from an applicant's logged cross country time resulting in denial of the practical test because logged cross country time equaled logged pilot time. I have never observed such occurrence in my three decades of flight instruction.

It appears that the correct logging of cross country pilot time for meeting aeronautical experience needs to be clarified, that is, does one log actual airborne flight time [time acquired during flight, FAR 61.1] during cross country or does one log total pilot time of the flight as defined by FAR 1.1 where pilot time logged is the same as cross country time logged.

Respectfully,


William W. Grannis

Certificated Flight Instructor

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[REDACTED]
[REDACTED]