



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

Office of the Chief Counsel  
800 Independence Ave., SW.  
Washington, DC 20591

**SEP 20 2016**

Norman W. Robinson, Jr.  
[REDACTED]  
[REDACTED]

RE: Clarification of flight training requirements for certificated flight instructors training first-time glider instructor applicants in 14 C.F.R. § 61.195(h)

Dear Mr. Robinson,

This letter responds to your June 20, 2016, request for a legal interpretation of 14 C.F.R. § 61.195(h), which sets forth the qualifications of certificated flight instructors (CFI) for training first-time flight instructor applicants. Specifically, you asked whether the 80 hours of flight training required in § 61.195(h)(2)(v) for a CFI to train first-time glider flight instructor applicants must have been given in gliders.<sup>1</sup> You contend that once a CFI has obtained the glider rating on his/her flight instructor certificate, he/she is permitted to begin training first-time glider flight instructor applicants. We agree with your contention in part.

Subject to an exception in § 61.195(h)(3)(ii) for flight instructors seeking to serve as a flight instructor in an FAA-approved course for the issuance of a flight instructor rating, under § 61.195(h)(2), “a flight instructor who provides training to an initial applicant for a flight instructor certificate must—

- (i) Meet the eligibility requirements prescribed in § 61.183 of this part;
- (ii) Hold the appropriate flight instructor certificate and rating;
- (iii) Have held a flight instructor certificate for at least 24 months;
- (iv) For training in preparation for an airplane, rotorcraft, or powered-lift rating, have given at least 200 hours of flight training as a flight instructor; and
- (v) For training in preparation for a glider rating, have given at least 80 hours of flight training as a flight instructor.<sup>2</sup>

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<sup>1</sup> Although you referenced “§ 61.195(h)(iv)” with regard to the 80-hour training requirement in preparation for a glider rating, we assume that you intended to reference the requirement in § 61.195(h)(2)(v).

<sup>2</sup> We note that your request for legal interpretation does not indicate that you are seeking to serve as a flight instructor in an FAA-approved course for the issuance of a flight instructor rating. Therefore, we have not addressed the alternative requirements in paragraph (h)(3) herein.

The text of § 61.195(h)(2)(v) is unambiguous, providing that at least 80 hours of flight training as a flight instructor must be accomplished as a prerequisite to training first-time CFI applicants for a glider rating. *See* Legal Interpretation issued to Mr. Troy Wadsworth (Sep. 12, 2008). This provision does not require that the 80 hours of flight training as a flight instructor must be given in gliders and the history of this rule provision does not indicate contrary intent. *See* Certification: Pilots and Flight Instructors, 37 FR 6012 (Mar. 23, 1972) and 38 FR 3156 (Feb. 1, 1973).

Therefore, we agree with your contention that if you have accomplished more than 80 hours of flight training as a flight instructor in airplanes and helicopters to satisfy the requirement in § 61.195(h)(2)(v), then you would be eligible to give training to first-time CFI applicants in preparation for a glider rating. However, obtaining the glider rating on a CFI certificate does not automatically trigger eligibility to give training to first-time CFI applicants seeking a glider rating, as your letter implies. All of the eligibility requirements in § 61.195(h)(2) must be met.

This response was prepared by Bonnie C. Dragotto, an attorney in the Regulations Division of the Office of the Chief Counsel, and was coordinated with the General Aviation and Commercial Division of the Flight Standards Service. If you need further assistance, please contact our office at (202) 267-3073.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lorelei Peter".

Lorelei Peter  
Assistant Chief Counsel for  
Regulations, AGC-200

Norman W. Robinson, Jr.

June 20, 2016

Office of Chief Counsel  
Federal Aviation Administration  
800 Independence Ave., S.W.  
Washington, D.C. 20591

Re: Request of Clarification of 14 C.F.R. Part 61.195(h).

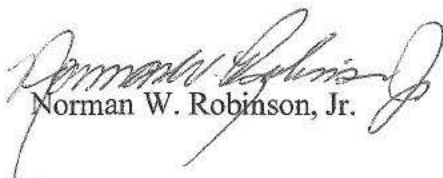
Dear Sir:

I hold a flight instructor certificate with airplane single and multiengine, rotorcraft-helicopter, and instrument airplane and helicopter ratings. I have held this certificate for several years, exceeding the time required by 14 C.F.R. Part 61.195(h)(2)(iii). I have given more than a 1,000 hours of flight training in both airplanes and helicopters as a flight instructor, exceeding the time required by 14 C.F.R. Part 61.195(h)(iv). I have given ground and flight training for first-time flight instructor applicants in airplanes and helicopters.

I have added a glider rating with commercial privileges to my ATP certificate, and plan on adding a glider rating to my flight instructor certificate. The way I understand 14 C.F.R. Part 61.195, as soon as I obtain the glider rating on my flight instructor certificate I can train first-time glider flight instructor applicants. According a two designated pilot examiners, I first need to have given 80 hours of flight training in gliders (14 C.F.R. Part 61.195(2)(v)).

May I train first-time glider flight instructor applicants right away, or do I need to obtain the 80 hours as a glider flight instructor first?

Thank you,

  
Norman W. Robinson, Jr.