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U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

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National Policy

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

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- 1. Purpose of This Notice.** This notice provides guidance to principal operations inspectors (POI) with oversight responsibilities for Title 14 of the Code of Federal Regulations (14 CFR) part 119 certificate holders conducting 14 CFR part 121 and/or 14 CFR part 135 operations on regulatory requirements for flight instructors and check pilots/check Flight Engineers (FE).
- 2. Audience.** The primary audience for this notice is Flight Standards District Office (FSDO), Certificate Management Team (CMT), and certificate management office (CMO) aviation safety inspectors (ASI) having oversight of part 121 and certain part 135 certificate holders. The secondary audience includes the Flight Standards (AFS) branches and divisions in the regions and headquarters (HQ).
- 3. Where You Can Find This Notice.** You can find this notice on the MyFAA employee website at [https://employees.faa.gov/tools\\_resources/orders\\_notices](https://employees.faa.gov/tools_resources/orders_notices). Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.av.faa.gov>. Operators and the public may find this information at <http://fsims.faa.gov>. This notice is available to the public at [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).
- 4. Background.** Part 119 certificate holders conducting part 121 and/or part 135 operations are required to provide flight instructors and check pilots/check FEs to support their operational infrastructure. In some cases, certificate holders have not established sufficient numbers of check pilots/check FEs to perform regulatory mandated checks and have been dependent on the FAA to conduct the checks. This notice reaffirms the regulatory obligations imposed on certificate holders with training programs, specifically the need to establish qualified instructors and check pilots/check FEs to conduct regulatory mandated checks and other associated duties.

## 5. Definitions and Regulatory Requirements.

**a. Check Airman.** The new terms "check pilot" and "check Flight Engineer" are replacing the older term "check airman" in regulations and guidance and are synonymous with "check airman."

**b. Part 121 and Part 135 Regulatory Requirements.** Part 121 and part 135 contain the following regulatory requirements:

§ 121.401 Training program: General.	§ 135.323 Training program: General.
<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>(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>

**6. Discussion.** All part 121 air carriers and all part 135 air carriers/operators that are required to have a training program under part 135, § 135.341 must provide an adequate number of appropriately qualified personnel to conduct all flight training and checking required under the applicable operating part.

**a. Training and Qualification.** As a basic requirement of certification, each certificate holder described above must develop and submit for approval curriculum(s) modules to train and qualify flight instructors and check pilots/check FEs in its particular flightcrew member training and qualification program, in accordance with §§ 135.337—135.340 and part 121, §§ 121.411—121.414. Some certificate holders may elect to contract for these services; however, this does not relieve the certificate holder of its responsibility to adequately describe how these personnel will be trained and qualified. POIs must require certificate holders without such currently approved flight instructor and check pilot/check FE training and qualification curriculum(s) to develop an acceptable timeline for the prompt production and submission of such curriculums.

**b. Quantity of Flight Instructors and Check Pilots.** In addition, certificate holders must ensure that enough flight instructors are 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 certificate holder. Certificate holders should not plan to rely on FAA resources to conduct the required checking activities. Certificate holders may request FAA resources (e.g., for a new aircraft type) but are responsible for maintaining an adequate number of flight instructors and check pilots/check FEs for their planned operations.

**7. Action.** POIs must work with their assigned certificate holders to ensure that those who are required to have flight instructors and check pilots/check FEs have approved curriculum(s) to qualify persons to perform these functions. POIs must notify each identified certificate holder that does not have required flight instructor and/or check pilot/check FE training and qualification curriculum(s) that a revision to their training program is required in accordance with § 121.405(e) or 135.325(d). POIs must ensure that certificate holders meet their regulatory requirements to maintain enough qualified personnel to conduct required flight training and flight checks without reliance upon FAA resources.

**Note:** This notice does not create any restriction on inspector observation of training or checking being performed by the certificate holder, at any time, with or without notice. It also does not restrict the FAA performance of checking functions when, in the judgment of the POI, such performance is necessary or advantageous.

**8. Recording.** There are no recording/reporting requirements associated with this notice.

**9. Disposition.** This notice will expire one year after publication and will not be incorporated into FAA Order 8900.1. Direct questions concerning the information in this notice to the Air Carrier Training Systems and Voluntary Safety Programs Branch (AFS-280) at 202-267-8166.

John S. Duncan  
Director, Flight Standards Service