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The Newsletter on Worldwide Aviation Accreditation

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Aviation Accreditation Board International

March 5, 2012

## FAA RELEASES NPRM ON FIRST OFFICER QUALIFICATIONS

*AABI Urges Members to Send Comments on the NPRM by April 30, 2012*

The FAA has published the long-awaited Notice of Proposed Rule Making (NPRM) on First Officer Qualification (FOQ) requirements for air carrier operations (<http://regulations.gov/#!documentDetail;D=FAA-2010-0100-1340>). The proposed regulations would increase the number of logged flight hours required to fly for an FAR Part 121 carrier to 1,500 hours for all pilots, and first officers would need a type rating for the aircraft they are flying in order to operate under FAR 121. The 1,500 flight hours requirement would be reduced to 750 for former military pilots and 1,000 for graduates of university or college flight schools. The FOQ Aviation Rulemaking Committee (ARC) report, which was released with the NPRM, had a graduated scale of credit for graduates of collegiate flight programs, tiered from the highest amount of credit for graduates of four-year AABI-accredited flight programs who work as flight instructors, to associate degree programs and other college and university programs (see Table 1). The recommended amount of credit ranged from 350 hours for the top tier, to 100 hours for graduates of two-year flight programs.

The FAA is proposing to allow pilots from collegiate aviation degree programs, and those with military experience, to obtain an Airline Transport Pilot (ATP) certificate with restricted privileges, while having accrued less than 1,500 total hours. Moreover, the FAA proposes to allow those pilots to complete a new FAA-approved ATP certification training program for multi-engine class rating or type rating, and obtain training in flight simulation or training devices to experience difficult operating conditions and a multi-person crew environment prior to serving as flight crew members in air carrier operations. The

FAA adopted some of the recommendations of the FOQ ARC, which included expanded academic training and knowledge that would be incorporated in the proposed Part 61 Section 154, which sets forth the requirements to take the knowledge test for the Airline Transport Pilot certificate. The applicant must present a certificate of completion from an authorized training provider under Part 121, 135, 141 or 142, that includes 24 hours of classroom instruction, including high altitude operations, aerodynamics and physiology, meteorology and air carrier operations; plus 16 hours of training in flight simulation training devices that represent a multi-engine turbine aircraft; at least 8 hours are required to be conducted in Level C or higher full-flight simulators, including stalls, upset recovery, and adverse weather conditions; and at least 8 hours of training must be included in Level 4 or higher flight training devices on aircraft performance, navigation, automation and crew resource management.

Under proposed Part 61 Section 160 for an airplane category rating with restricted privileges, a person holding a baccalaureate degree with an aviation major from an accredited four-year post-secondary institution who holds a commercial pilot certificate with an airplane category and instrument rating obtained from an affiliated Part 141 pilot school may apply for the ATP certificate with a minimum of 1,000 hours of total time as pilot, to include at least 325 hours cross-country time, 100 hours of night time, 50 hours in the multi-engine airplane, 75 hours of instrument flight time, of which 25 hours could be in a flight simulator or flight training

device. **Note:** Section 600.2 of the Higher Education Act of 1965 defines accredited as “the status of public recognition of a nationally recognized accrediting agency grants to an institution or educational program that meets the agency’s established requirements.”

Responses to the FAA docket 2010-0100 are to be submitted within sixty days of the date of publication of the NPRM, which was February 29, 2012. The deadline for submission is **April 30, 2012**. To submit your comments electronically, go to the Federal Rulemaking Portal: <http://www.regulations.gov> and follow the online instructions. To read background documents or comments received, go to <http://regulations.gov> and follow the online instructions for accessing the docket.

From our contact with AABI members, the hope was that specific credit for AABI-accredited flight programs would be granted, but the 500 hours credit is considered better than no credit. For educator members who would consider teaching the courses under 61.154, a major concern is the eight hours in a Level C simulator and the ATP requirements for the faculty.

As AABI did with the Advanced Notice of Proposed Rule Making (ANPRM), we strongly encourage all members to actively participate in the NPRM, individually and/or on behalf of your company/organization/institution. The potential impact, for AABI-accredited programs specifically and collegiate aviation programs generally, is staggering. We all have a vested interest in the outcome of this legislation and proposed rule, and must “mobilize the troops” and keep all stakeholders fully involved and informed.

In a March 2, 2012, meeting of the AABI Executive Committee, it was decided that the AABI chairperson will form an Ad Hoc Committee for the purposes of formulating AABI’s response to the NPRM, which will meet later this month. Additional information and details will be communicated to the AABI membership as soon as they become available.

**Table 1 – Academic and Practical Training Program Valuation with Regard to Aeronautical Experience Credits**

**\*\*Taken from FAA’s First Officer Qualifications Aviation Rulemaking Committee (FOQ ARC) Report\*\***

Educational Source of Aeronautical Knowledge	Nominal Flight Time (hours)	Aeronautical Experience Credit Value
4-year Aviation University/College AABI-Accredited Flight Training Program	250	350
4-year Aviation University/College Flight Training Program	250	200
2-year Aviation College AABI-Accredited Flight Program	250	150
2-year Aviation College Flight Training Program	250	100
Flight Academy (Part 141/142) Flight Training Program	250	100
Part 141 Training Program	250	50
Part 61 Flight Training Program	250	0
Military “Fixed Wing” Flight Training Program <sup>1</sup>	1	750
Military “Rotary Wing” Flight Training Program <sup>1</sup>	1	500
Initial certified flight instructor certificate <sup>2</sup>	25	100
Each additional certified flight instructor rating <sup>2</sup>	10	50
Military Instructor Pilot <sup>1</sup>	1	200
AJT Course <u>not</u> resulting in a type rating	0	200
AJT Course resulting in a type rating	0	250

<sup>1</sup> Awarding credit for military flight training was based on the FOQ ARC’s assessment of the value of training in turbine-powered aircraft with systems, avionics, aerodynamics, and flight environments similar to those used in Part 121 aircraft. In contrast, most civilian flight training organizations do not have similar access to turbine equipment.

<sup>2</sup> Applicable to only certified flight instructor-airplane single engine, certified flight instructor-instrument airplane, and certified flight instructor-multiengine airplane.