

MARKER INBOUND LLC

DISCUSSIN ON AATD REGULATIONS

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Here is the discussion of pertinent regulations I promised.

***The first thing we will discuss is the fact that in spite of everything else you read, the FAA gives itself the authority to approve OTHER devices on a case by case basis. This is highlighted in FAR 61.4 as below, and the specifics are in the form of a Letter of Authorization (LOA) issued for the particular device, also below. Bottom line? THE LOA is ALL YOU NEED AND IS THE KEY TO EVERYTHING!***

#### **61.4 Qualification and approval of flight simulators and flight training devices.**

(a) Except as specified in [paragraph \(b\)](#) or [\(c\)](#) of this section, each flight simulator and flight training device used for training, and for which an airman is to receive credit to satisfy any training, testing, or checking requirement under this chapter, must be qualified and approved by the Administrator for -

**(c) The Administrator may approve a device other than a flight simulator or flight training device for specific purposes.**

***Great! So below you will find (As an example.) where the regulations permit completion of 50 hours in an AATD for the Commercial Pilot Certificate... BUT... you will notice the FAA lists “full motion simulator or flight training device...” of which an AATD is neither! But, referring back up to 61.4, the FAA can approve other devices as it sees fit, through an LOA.***

#### **14 CFR 61.129(i)**

***Permitted credit for use of a flight simulator or flight training device.***

(1) Except as provided in [paragraph \(i\)\(2\)](#) of this section, an applicant who has not accomplished the training required by this section in a course conducted by a training center certificated under [part 142 of this chapter](#) may:

**(i) Credit a maximum of 50 hours toward the total aeronautical experience requirements for an airplane or powered-lift rating, provided the aeronautical experience was obtained from an authorized instructor in a full flight simulator or flight training device that represents**

that class of airplane or powered-lift category and type, if applicable, appropriate to the rating sought;

***Below is the regulation on use of an AATD for 20 hours of instrument time for the Instrument rating. Notice they actually use the phrase AATD this time:***

**14 CFR 61.65(h)(1)**

(i) ***Use of an aviation training device.*** A maximum of 10 hours of instrument time received in a basic aviation training device or a maximum of 20 hours of instrument time received in an advanced aviation training device may be credited for the instrument time requirements of this section if -

- (1) The device is approved and authorized by the FAA;
- (2) An authorized instructor provides the instrument time in the device; and
- (3) The FAA approved the instrument training and instrument tasks performed in the device.

***Also, you must have an authorized instructor:***

**(g) Logging instrument time.**

A person may use time in a full flight simulator, flight training device, or aviation training device for acquiring instrument aeronautical experience for a pilot certificate or rating provided an authorized instructor is present to observe that time and signs the person's logbook or training record to verify the time and the content of the training session.

(5) A person may use time in a full flight simulator, flight training device, or aviation training device for satisfying instrument recency experience requirements provided a logbook or training record is maintained to specify the training device, time, and the content.

**(h) Logging training time.**

(1) A person may log training time when that person receives training from an authorized instructor in an aircraft, full flight simulator, flight training device, or aviation training device.

***Below is a copy of the Letter of Authorization (LOA) issued with my AATD. The specific times are listed for each certificate/rating sought. This is the ONLY part of this page you need to understand, only to the point of what time/maneuvers are approved. It is valid for 60 calendar months. DON'T EVER FLY/PAY FOR AATD TIME BEFORE VIEWING THE SPECIFIC LOA FOR THE DEVICE YOU WILL BE FLYING! It should be posted near the device and the instructor should provide you with a copy. A digital copy is acceptable. Pay particular attention to the date of issue and time and maneuvers authorized. If expired, DON'T FLY IT!***

**PRECISION FLIGHT CONTROLS CR-12 PRO PANEL LETTER OF AUTHORIZATION:**

March 31, 2022

Mr. Mike Altman

CEO, Precision Flight Controls

2747 Mercantile Drive, STE 100

Rancho Cordova, CA 95742

Dear Mr. Altman:

The Federal Aviation Administration (FAA) last qualified and approved your airplane Precision Flight Controls model CR-12 and CR-12 ProPanel as an Advanced Aviation Training Device (AATD) on January 26, 2017, in accordance with Title 14 of the Code of Federal Regulations (14 CFR) § 61.4(c).

Review of the revised Qualification and Approval Guide (QAG) version 1.1 dated December 11, 2021, validates the current standards and criteria for approval as provided in Advisory Circular (AC) 61-136, FAA Approval of Aviation Training Devices and Their Use for Training and Experience. **The Precision Flight Controls model CR-12 and CR-12 ProPanel airplane AATD is approved for use in satisfying the following sections of parts 61 and 141:**

Precision Flight Controls Model CR-12 and CR-12 ProPanel

## Airplane Single and Multiengine Land

### Advanced Aviation Training Device (AATD)

- § 61.51(b)(3) – Logbook entries;
- § 61.51 (h) – Logging training time;
- § 61.57(c) – Instrument experience;
- § 61.57(d)(1) – Instrument proficiency check, per the Instrument ACS;
- § 61.65(i) – Instrument rating; up to 20 hours;
- § 61.109(k)(1) – Private Pilot Certificate aeronautical experience: up to 2.5 hours;
- § 61.129(i)(1)(i) – Commercial Pilot Certificate: up to 50 hours;
- § 61.159(a)(4)(i) – Airline Transport Pilot Certificate: up to 25 hours; and
- § 141.41(b) – Approved for use under the part 141 appendices as follows:
  - Appendix B – Up to 15% toward the total Private Pilot training time requirements;
  - Appendix C – Up to 40% toward the total Instrument training time requirements;
  - Appendix D – Up to 20% toward the total Commercial Pilot training time requirements;
  - Appendix E – Up to 25% toward the total Airline Transport Pilot training time requirements;
  - Appendix F – Up to 5% toward the total Flight Instructor training time requirements;
  - Appendix G – Up to 5% toward the total Flight Instructor Instrument training time requirements;
  - Appendix I, Private Pilot adding Airplane Category and Single Engine or Multiengine Class Rating Course – Up to 3 hours toward the total training time requirements;
  - Appendix I, Commercial Pilot adding Airplane Category and Single Engine or Multiengine Class Rating Course – Up to 11 hours toward the total training time requirements;

□ Appendix I, Airline Transport Pilot adding Airplane Category and Single Engine or Multiengine Class Rating Course – Up to 6.25 hours toward the total training time requirements; and

□ Appendix M, Combined Private Pilot Airplane Certification and Instrument Rating – Up to 25% toward the total training time requirements

Note: Minimum training or experience requirements for cross country, night, solo, takeoffs and landings, and the 3 hours of training with an authorized instructor in preparation for the practical test within the preceding 2 calendar months from the month of the test must be accomplished in an aircraft.

Private Pilot Airplane applicants must also accomplish the minimum requirement for 3 hours of control and

maneuvering of an airplane solely by reference to instruments specified in § 61.109 in an airplane. No portion of the practical test or type specific training credit can be conducted in an AATD. Additionally, the flight portion of a flight review specified in § 61.56(a) cannot be accomplished in an AATD.

This approval is contingent upon the following conditions and limitations:

- 1) This AATD must maintain its performance and function without degradation. The minimum instrument requirements specified under § 91.205 for day visual flight rules (VFR) and instrument flight rules (IFR) must be functional during the training session;
- 2) Only the aircraft make/model and configurations that are in the approved QAG can be utilized. A copy of the FAA approved QAG detailing the approved makes, models, and configurations must be provided to the operator and be readily available when the AATD is in use;
- 3) A copy of this letter of authorization (LOA) must be readily available in a location near the device when in use. Additionally, a copy must be provided to the person using the above credits for pilot certification or ratings;
- 4) When used for instructional purposes, only an appropriately qualified FAA certificated flight instructor may make any subsequent endorsements and/or pilot

logbook entries. Pilot time in an ATD may be logged as instruction received, instrument time, or total time only. See FAA airman application 8710-1;

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5) Any changes or modifications to this AATD which have not been individually reviewed, evaluated, and approved in writing by the General Aviation and Commercial Division will terminate this LOA; and

6) The FAA reserves the right to withdraw this LOA at any time if the Administrator determines that this AATD has been used in a manner contrary to the conditions and limitations described within this LOA, FAA regulation, guidance, or safety.

This approval is valid for sixty (60) calendar months from the date of this letter. Any requests for a new LOA should be made in writing to The General Aviation and Commercial Division at least 90 days in advance of expiration. The General Aviation and Commercial Division may require a review of the QAG, an on-site functional evaluation, and verification of all the AATD requirements as described in FAA Order 8900.1 Volume 11, Chapter 10, Section 1, Approval, Oversight, and Authorized Use Under 14 CFR Parts 61 and 141 before a new LOA is issued.

This approval expires on March 31, 2027.

The enclosed signed QAG is approved and a copy of this letter is retained in our files.

Sincerely,

Everette C. Rochon, Jr.

Manager, Training and Certification Group

General Aviation and Commercial Division