NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.258

National Policy

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SUBJ: Logging of Unmanned Aircraft Systems Pilot Time

1. Purpose of This Notice. This notice provides guidance and policy for aviation safety inspectors (ASI) who conduct pilot certification duties. This notice clarifies issues that have been raised by Unmanned Aircraft Systems (UAS) pilots requesting credit for flight time accrued while operating UAS.

2. Audience. The primary audience for this notice is Unmanned Aircraft Systems Integration Office (AFS-80), Air Transportation Division (AFS-200), and General Aviation and Commercial Division (AFS-800) personnel at the Federal Aviation Administration (FAA) Washington headquarters (HQ), as well as designees, ASIs, their managers and supervisors, and other operational and administrative employees at the regional field offices and Flight Standards District Offices (FSDO).

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee Web site at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avs.faa.gov. Operators can find this notice on the FAA's Web site at http://fsims.faa.gov. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Applicability. This notice applies to pilots who have been issued FAA pilot certificates (as well as UAS pilots who do not currently hold an FAA pilot certificate) seeking credit for UAS flight time towards total pilot time.

5. Background.

a. Federal Register (FR) Notice. In 2007, the FAA published a notice in the FR (72 FR 6689, February 13, 2007) that all unmanned aircraft, regardless of size, performance capability, or purpose of flight, are considered aircraft. This determination was made in response to the dramatic growth in the number of unmanned operations being conducted, the reliance on complex, uncertified technologies, and the resulting overall increase in risks to persons in the air and on the ground.

b. Definition of Pilot and Operator. The terms "pilot" and "operator" have historical meanings in aviation, which may have led to some confusion within the UAS community. As

defined by the FAA in Title 14 of the Code of Federal Regulations (14 CFR) part 1, § 1.1, the term "operate," "…with respect to aircraft, means use, cause to use or authorize to use aircraft, for the purpose... of air navigation including the piloting of aircraft, with or without the right of legal control…." This means that an operator is the person or entity responsible for the overall aircraft and that may include a broad range of areas, such as maintenance, general operations, specific procedures, and selecting properly trained and certified flightcrew members to fly the aircraft. The pilot in command (PIC), also defined in § 1.1, is the final authority for an individual flight. Pilots are persons appropriately trained to fly aircraft.

6. Discussion.

a. Military Pilot Training. The FAA noted in the Pilot Certification and Qualification Requirements for Air Carrier Operations Final Rule, which was published in the FR (78 FR 42345, July 15, 2013), that "Graduation from a training program designed to qualify a military pilot solely for operation of unmanned aircraft systems will not satisfy the requirement in (14 CFR part 61,) § 61.160(a). Additionally, the FAA notes that regulations do not currently permit the time acquired while operating an unmanned aircraft system to be logged to meet aeronautical experience requirements for FAA certification."

b. Flight Time Requirements. Under current regulations, UAS operations are not creditable as flight time toward any aeronautical experience requirements under 14 CFR part 61, 63, or 65. UAS operating experience (OE) also is not creditable toward the currency requirements under part 61.

7. Action.

a. Recording UAS Flight Time. As pilots gain OE with UAS, requests for civilian pilot certificates and flight-hour credit based on these activities have become more frequent at FSDOs. Advise UAS pilots requesting credit for UAS flight time that there are currently no methods in place for obtaining an FAA UAS pilot certificate. As UAS integration and rulemaking progresses, time accrued in UAS operations may be credited in the future for UAS certificates and ratings. Therefore, UAS pilots should continue to log flight time and operational activities to include the make, model, and series (M/M/S) of UAS operated. The pilot or operator may log this time in a paper or electronic format at his or her discretion; however, UAS pilots should not log this time in the same columns or categories as time accrued during manned flight.

b. Creditable UAS Flight Time. Advise UAS pilots that all UAS time is creditable for meeting the experience requirements for operating a UAS under a Certificate of Authorization or Waiver (COA) or the operating limitations under a special airworthiness certificate issued for UAS operations. This time is also creditable toward maintaining an organization's experience requirements.

c. Inspector's Action. DO NOT accept an application for a certificate or rating under part 61, 63, or 65 where the applicant is seeking credit for UAS flight time.

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8. Disposition. We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Information contained in this notice will also be incorporated in the next revision of Advisory Circular (AC) 61-65, Certification: Pilots and Flight and Ground Instructors. Direct questions concerning the information in this notice to AFS-800 at 202-385-9600.

ORIGINAL SIGNED by

/s/ John Barbagallo
Acting Director, Flight Standards Service

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