

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.286

National Policy

Effective Date:
3/9/15

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3/9/16

SUBJ: Part 121 Training Program Review

- 1. Purpose of This Notice.** This notice requires principal operations inspectors (POI) to conduct a focused program review of Title 14 of the Code of Federal Regulations (14 CFR) part 121 approved training programs. The objective of this review is to identify and correct part 121 training programs that include credit between airplanes with different type certificates (TC) without an approved related aircraft designation and/or approved related aircraft deviation.
- 2. Audience.** The primary audience for this notice is Flight Standards District Office (FSDO), Certificate Management Team (CMT), and certificate management office (CMO) Operations aviation safety inspectors responsible for the oversight of certificate holders conducting part 121 operations. The secondary audience includes other Flight Standards Service (AFS) personnel in certificate-holding district offices (CHDO), Federal Aviation Administration (FAA) branches and divisions in the regions, and headquarters (HQ) AFS personnel.
- 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. Background.** On November 12, 2013, the FAA published the Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers final rule, which revised the training and qualification requirements for flightcrew members conducting operations under part 121. Effective March 12, 2014, to modify flightcrew member training and qualification requirements based on commonality between airplanes, a certificate holder must have an approved related aircraft designation and approved related aircraft deviations if the airplanes have different TCs. This requirement applies to training and qualification under part 121 subpart N, Training Program, and subpart O, Crewmember Qualification, as well as training and qualification under part 121 subpart Y, Advanced Qualification Program.
- 5. Approval Authority.** The Air Transportation Division (AFS-200) retains the authority to approve or deny a request for related aircraft designations and a request for deviation based on related aircraft designations. A POI has the authority to approve related aircraft differences

training, but only if AFS-200 has approved the related aircraft designation for that certificate holder.

6. Guidance. FAA Order 8900.1 Volume 3, Chapter 19, Section 12 describes the processes for approval of a related aircraft designation, approval of related aircraft differences training, and authorization of deviations based on a related aircraft designation.

7. Airplane Examples. The following are examples of airplanes for which a certificate holder will need to request an approved related aircraft designation and/or related aircraft deviations if the certificate holder wants to take credit between the airplanes for flightcrew member training and qualification requirements. Although some of the listed airplane pairs have a common type rating, the airplanes have two different TCs. These examples are not all-inclusive:

- Airbus 320 and Airbus 330,
- Boeing 757 and Boeing 767,
- Boeing 777 and Boeing 787, and
- Embraer 170 and Embraer 190.

8. Flight Standardization Board (FSB) Reports. An FSB report may provide recommendations for credit between airplanes with different TCs for flightcrew member training and qualification requirements. A certificate holder must have an approved related aircraft designation and/or approved related aircraft deviation to incorporate these recommendations into their training program.

9. Related Aircraft Designation. A related aircraft designation is necessary if the certificate holder seeks approval of related aircraft differences training to take credit between airplanes with different TCs for flightcrew member training. This applies to all training categories.

a. Example 1. A certificate holder has a Boeing 757/767 pilot-in-command (PIC) initial training curriculum.

(1) If the certificate holder has an approved related aircraft designation with the Boeing 757 as the base aircraft and the Boeing 767 as the designated related aircraft, the PIC initial training curriculum must include at least:

(a) All subjects required by § 121.419 and all flight maneuvers and procedures required by § 121.424 for the Boeing 757, and

(b) All subjects, flight maneuvers, and procedures required by § 121.418(b) for the Boeing 767.

(2) If the certificate holder does not have an approved related aircraft designation, the PIC initial training curriculum must include:

(a) All subjects required by § 121.419 and all flight maneuvers and procedures required by § 121.424 for the Boeing 757, and

(b) All subjects required by § 121.419 and all flight maneuvers and procedures required by § 121.424 for the Boeing 767.

b. Example 2. A certificate holder has a Boeing 787 second-in-command (SIC) transition training curriculum with a prerequisite requirement that the pilot is qualified and current on the Boeing 777. The certificate holder may request a related aircraft designation to seek approval for related aircraft differences training from the Boeing 777 to the Boeing 787.

(1) If the certificate holder has an approved related aircraft designation with the Boeing 777 as the base aircraft and the Boeing 787 as the designated related aircraft, the SIC transition training curriculum must include all subjects, flight maneuvers, and procedures required by § 121.418(b) for the Boeing 787.

(2) If the certificate holder does not have an approved related aircraft designation, the SIC transition training curriculum must include all subjects required by § 121.419 and all flight maneuvers and procedures required by § 121.424 for the Boeing 787.

10. Related Aircraft Deviation for Operating Experience and Operating Cycles. A related aircraft deviation is necessary if the certificate holder would like to receive credit between airplanes with different TCs for Operating Experience (OE) and operating cycles.

a. Example 1. In accordance with § 121.434(c)(3), a pilot who has completed PIC Boeing 757/767 initial training must complete 25 hours of OE and four cycles on the Boeing 757 and 25 hours of OE and four cycles on the Boeing 767. A certificate holder may request a related aircraft deviation in accordance with § 121.434(a)(4) to take credit for the OE and cycles between the Boeing 757 and 767.

b. Example 2. In accordance with § 121.434(c)(3), a pilot who has completed SIC transition training from the Boeing 757 to the Boeing 767 must complete 15 hours of OE and four cycles on the Boeing 767. A certificate holder may request a related aircraft deviation in accordance with § 121.434(a)(4) to take credit for the OE and cycles between the Boeing 757 and 767.

11. Related Aircraft Deviation for Line Operating Flight Time for Consolidation of Knowledge and Skills. A related aircraft deviation is necessary if the certificate holder wants to take credit for line operating flight time for consolidation of knowledge and skills between airplanes with different TCs.

a. Example 1. In accordance with § 121.434(g), a pilot who has completed PIC Boeing 757/767 initial training must complete 100 hours of line operating flight time in the Boeing 757 and 100 hours of line operating flight time in the Boeing 767 within 120 days after the type rating practical test or the § 121.441 proficiency check. A certificate holder may request a related aircraft deviation in accordance with § 121.434(a)(4) to take credit for the line operating flight time between the Boeing 757 and 767.

b. Example 2. In accordance with § 121.434(g), a pilot who has completed SIC transition training from the Boeing 757 to the Boeing 767 must complete 100 hours of line operating flight time in the Boeing 767 within 120 days after the § 121.441 proficiency check. A certificate

holder may request a related aircraft deviation in accordance with § 121.434(a)(4) to take credit for the line operating flight time between the Boeing 757 and 767.

12. Related Aircraft Deviation for Recent Experience. A related aircraft deviation is necessary if the certificate holder wants to take credit between airplanes with different TCs for maintaining or re-establishing recency-of-experience.

a. Example 1. In accordance with § 121.439(a), a pilot who is dual qualified on both the Boeing 757 and the Boeing 767 must complete at least three takeoffs and landings on the Boeing 757, and three takeoffs and landings on the Boeing 767, within the preceding 90 days. A certificate holder may request a related aircraft deviation in accordance with § 121.439(f) to take credit for the takeoffs and landings between the Boeing 757 and the Boeing 767.

b. Example 2. In accordance with § 121.439(a), a pilot who is dual qualified on both the Boeing 757 and Boeing 767, and fails to make the required takeoffs and landings on both the Boeing 757 and Boeing 767, must re-establish recency-of-experience on both the Boeing 757 and Boeing 767. A certificate holder may request a related aircraft deviation in accordance with § 121.439(f) to take credit for the required maneuvers to re-establish recency-of-experience between the Boeing 757 and the Boeing 767.

13. Requirements with No Related Aircraft Deviation Authority.

a. Pairing Requirement. In accordance with § 121.438(b), either the PIC or SIC must have at least 75 hours of line operating flight time on the specific airplane type to conduct operations under part 121. There is no deviation authority based on a related aircraft designation under § 121.438(b). Therefore, the 75 hours of line operating flight time must be obtained on each airplane type. For example, to conduct operations under part 121, either the PIC or SIC must have completed 75 hours of line operating flight time on the Boeing 757. This requirement applies even if the PIC and/or SIC are dual qualified on both the Boeing 757 and Boeing 767 and have 100 hours on the Boeing 767.

b. High Minimums. In accordance with § 121.652, the landing minimums must be increased by 100 feet and one-half mile at regular, provisional, and refueling airports if the PIC has not served at least 100 hours in the specific airplane type in part 121 operations. There is no deviation authority based on a related aircraft designation under § 121.652. Therefore, the 100 hours must be obtained in each airplane type. For example, a PIC with only 40 hours in the Boeing 757 must increase the landing minimums even if the PIC is dual qualified and has 100 hours in the Boeing 767.

14. Action. The focused program review consists of two phases. Phase I will identify all part 121 certificate holder training programs that allow credit between airplanes with different TCs for flightcrew member training and qualification requirements without an approved related aircraft designation and/or approved related aircraft deviation. Phase II will ensure that certificate holders request the applicable related aircraft designation and/or related aircraft deviations or revise the training program and submit it for POI approval.

a. Phase I. Within 60 days of issuance of this notice, POIs must conduct a focused review of the training program for their assigned certificate holder to identify if the certificate holder

allows credit between airplanes with different TCs for flightcrew member training and qualification requirements.

(1) **Training.** If the certificate holder has flightcrew member training curricula that allow credit for training between airplanes with different TCs, the POI must verify that the certificate holder has an AFS-200 approved related aircraft designation. If the certificate holder does not have an AFS-200 approved related aircraft designation, the POI must notify the certificate holder in writing that a revision to the training program is required in accordance with § 121.405(b) or (e), as applicable. This notification must state that within 30 days, the certificate holder must take one of the following actions:

(a) Submit a request for related aircraft designation in accordance with the guidance in Order 8900.1, Volume 3, Chapter 19, Section 12; or

(b) Submit a revision to the training program to remove the credit for training between airplanes with different TCs.

(2) **Qualification.** If the certificate holder allows credit between airplanes with different TCs for flightcrew member qualification requirements, the POI must verify that the certificate holder has the applicable AFS-200 approved related aircraft deviation. If the certificate holder does not have the applicable AFS-200 approved related aircraft deviation, the POI must notify the certificate holder in writing that a revision to the training program is required in accordance with § 121.405(b) or (e), as applicable. This notification must state that within 30 days, the certificate holder must take one of the following actions:

(a) Submit a request for related aircraft deviation in accordance with the guidance in Order 8900.1, Volume 3, Chapter 19, Section 12; or

(b) Submit a revision to the training program to remove the credit for qualification requirements between airplanes with different TCs.

Note: A certificate holder may submit the request for related aircraft deviation concurrently with the request for related aircraft designation.

b. Phase II. If the certificate holder submits a request for related aircraft designation and/or related aircraft deviation, the POI must follow the applicable process in Order 8900.1, Volume 3, Chapter 19, Section 12. If the certificate holder submits a revision to the training program, the POI must follow the process in Order 8900.1, Volume 3, Chapter 19, Section 2.

15. Disposition. We will not incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Transportation Division (AFS-200) at 202-267-8166.

ORIGINAL SIGNED by

/s/ John Barbagallo
Deputy Director, Flight Standards Service

Appendix A. Frequently Asked Questions.

1. What is a related aircraft?

A related aircraft is defined in § 121.400 as any two or more aircraft of the same make with either the same or different type certificates (TC) that have been demonstrated and determined by the Administrator to have commonality to the extent that credit between those aircraft may be applied for flightcrew member training, checking, recent experience, OE, operating cycles, and line operating flight time for consolidation of knowledge and skills.

2. When do differences training apply and when do related aircraft differences training apply?

Differences training applies to airplanes with the same TC and may be approved by a POI. Related aircraft differences training applies to airplanes with different TCs that have been designated as related. A POI may approve related aircraft differences training if AFS-200 has approved the related aircraft designation for that certificate holder. Depending on the fleet, differences training and related aircraft differences training may apply.

3. Is a certificate holder required to apply for a related aircraft designation to conduct related aircraft differences training under an Advanced Qualification Program (AQP)?

Yes. If a certificate holder's training program proposal includes related aircraft differences training, the certificate holder must first receive approval of the related aircraft designation from AFS-200 prior to initial approval of the curriculum.

4. Is a certificate holder conducting qualification under an AQP required to have authorization to deviate from §§ 121.434, 121.439, or 121.441?

Yes, if the deviation is based on a related aircraft designation.

5. Does the requirement for related aircraft designation apply to airplanes with common type ratings (e.g., Boeing 757 and Boeing 767)?

Yes. Airplanes with common type ratings have different TCs. Therefore, a certificate holder seeking approval of related aircraft differences training must first receive approval of a related aircraft designation from AFS-200.

6. Is a certificate holder that operates airplanes with common type ratings required to apply for a related aircraft designation?

No. A certificate holder's determination on whether to pursue a related aircraft designation or develop related aircraft differences training is voluntary. The alternative to related aircraft differences training is for the certificate holder to develop comprehensive training curricula for each airplane type.