



# Federal Aviation Administration

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## Memorandum

Date: 10/21/2014

To: Kim O. Davies, Manager, Technical Branch, ASO-230  
Diana L. Frohn, Manager, Orlando FSDO, ASO-ORL-FSDO-15

From: Susan Cabler, Acting Manager, Design, Manufacturing, & Airworthiness  
Division, AIR-100 *Sym Cabler*

Prepared by: Grant Schneemann, Airworthiness Certification Section, AIR-113

Subject: Approval of Deviation to FAA Order 8130.2G for Crew Training

Memo No.: AIR 100-141003-001

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This memorandum authorizes a deviation to FAA Order 8130.2G, chapter 4, section 11, paragraph 4125(c). This paragraph elaborates on the requirement of 14 CFR 21.191(c) and states that the crew training purpose is limited to only the applicant's flightcrews, which normally would be the manufacturer's employees necessary to be trained in experimental aircraft. It adds that these flightcrews operate aircraft being flight-tested in type certification programs or for production flight testing. Paragraph 4125(c) is more restrictive than the rule language in 21.191(c). This deviation does not expand the applicability of the rule.

Pegasus Technologies, Inc. (PTI) operate's out of Green Cove Springs, Florida, and is a Part 91 operator with extensive fixed and rotor wing experience, in experimental and Part 23, 25, 27, and 29 aircraft. Their intent is to train PTI flight crews on PTI aircraft, and not to offer training to the general public.

This deviation allows the Orlando Flight Standards District Office (FSDO) to issue experimental airworthiness certificates to PTI for MI-17-V5 and MI-172 aircraft for the purpose of crew training, as appropriate. Each program letter should clearly describe the following as part of the training plan, as appropriate:

1. For pilot transition training leading to a pilot authorization, the letter should identify:
  - Who within PTI will provide the training and their qualifications;
  - A training syllabus (see note below);
  - The time needed to complete the training, i.e., approximate number of hours over what period of time;
  - The estimated number of pilots to be trained; and,
  - The airport(s) and area(s) of operation where the training will be concluded.

NOTE: The training syllabus should follow an appropriate military training standard, e.g., Naval Air Training and Operating Procedures Standardization, or other training standard deemed acceptable. The Airline Transport Pilot and Aircraft Type Rating Practical Test Standards for Airplane should also be used as a guide for the tasks taught and expected flight crew performance standards.

2. For recurrent or revalidation training, the letter should identify:
  - Who within PTI will provide the training and what are their qualifications;
  - When would a pilot need this training, i.e., every 6 months, annually, after a specified period of inactivity, etc.;
  - A training syllabus;
  - The time needed to complete the training, i.e., approximate number of hours over what period of time;
  - Performance standards to complete the training; and
  - The airport(s) and area(s) of operation where the training will be conducted.

The operating limitations should only permit training flights necessary to complete the training plan. The operating limitations should also state that the occupants of the aircraft must be flightcrew employees of PTI. The Orlando FSDO may impose any additional operating limitations deemed necessary in the interest of safety. The final operating limitations must be coordinated with AIR-113, who will coordinate with AFS-800 and ASO-ORL-FSDO-15.

This deviation is valid until publication of the next change or revision to FAA Order 8130.2.

If you have any questions, please contact the Airworthiness Certification Section, AIR-113, at (202)-267-1575.

cc:

Mack Riley, Manager, Orlando Manufacturing Inspection District Office  
James W. Reedy, Unit 5 Front Line Manager, ASO-ORL-FSDO-15  
Jennifer Anderson, ASI, ASO-ORL-FSDO-15