

# **AFS-600** *Regulatory Support Division*

**Vol. 13, No. 3**

A quarterly publication designed to serve the  
**Examiner, Designee, and Instructor Community**

**JULY 2001**

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## **THE PRACTICAL TEST – PHILOSOPHY**

The practical test is the final step in the FAA certification process. It serves the dual purpose of determining that the applicant has completed the required training to a level of proficiency required by the Administrator and that the applicant can safely exercise the privileges of the certificate or rating being sought.

Title 14 of the Code of Federal Regulations (14 CFR) part 61 specifies the areas in which knowledge and skill must be demonstrated before the applicant can be issued a certificate or rating. The CFRs provide flexibility to permit the FAA to publish practical test standards containing specific tasks in which pilot competency shall be demonstrated. The Practical Test Standard publication has been created by the FAA to achieve the goals of standardized tests for certification, and to insure a fair and objective evaluation process. All designated pilot examiners, and FAA inspectors, are required to test applicants in accordance with the standards in the PTS, and to adhere to the policies set forth in the introduction to the publication. Flight instructors are expected to use the Practical Test Standards when preparing applicants for a practical test, and applicants should be familiar with its contents.

It should be remembered, however, that the Practical Test Standards publication is a “testing document” rather than a “training document”. The training an applicant receives toward a pilot certificate or rating should far exceed the training required to satisfactorily complete the specific tasks listed in the PTS. As a training document the PTS would be incomplete, in that it does not contain specific techniques/procedures to be used in training for and/or performing the task listed for evaluation. Nor is a complete list of all the tasks/knowledge areas a pilot must be competent in to safely exercise the privileges of his certificate. This information is contained in training documents such as the “Airplane Flying Handbook” (FAA-H-8083-3), and referenced in the PTS as the source document on techniques and procedures. As a testing document the PTS contains the standards for the specific task/knowledge items selected for practical testing, and as such, it must be adhered to.

The standards contained in each task in the PTS are clearly defined. However, the evaluation process requires that the examiner use judgement, discretion, and even intuitive insight in determining whether the applicant can, as the PTS requires, not only demonstrate the ability to perform the areas of operations within approved standards, but also to demonstrate “mastery of the aircraft” and “sound judgement”. No easy task for an evaluator.

Some examiners, based on their background experience and training, at times may feel strongly that, in the interest of aviation safety, a specific maneuver, procedure, technique and/or knowledge item, although not contained in the PTS, should nevertheless be included in their “total evaluation” of an applicant’s suitability for pilot certification. Their intentions may be laudable but, testing on items not specifically included in the appropriate PTS, and/or evaluating answers to oral questions based on reference sources other than those shown in the PTS, is inappropriate and not in keeping with the FAA’s intent of maintaining fairness to both the applicant and the recommending instructor, and objectivity in the evaluation/certification process.

The Practical Test Standards are the foundation of the airman certification process. Individuals who have been found to have: “the necessary knowledge, skill, experience, interest, and impartial judgement to merit special public responsibility,”\* can be designated as Pilot Examiners to administer the Practical Test Standards, and as such are: “authorized to act in accordance with the regulations and procedures prescribed by the Federal Aviation Administration relating to this designation”\*

\* from FAA Form 8000-5 pilot examiner certificate of designation.

## CROSS-COUNTRY CONFUSION

Some confusion regarding the requirements for the commercial long solo cross-country seems to exist.

Examiners are saying that the question and answer (Q&A) section located in the FAA’s web page clearly states that breaking up the cross-country by staying overnight is permissible. Plus, the regulation does not say the trip has to be made in one day. Boy, did that ever kick the door open. Remember the old adage “**give em’ an inch and they’ll take a mile.**” When a regulation is open ended, then almost any reasoning seems logical, thus creating confusion, doubt, and endless phone calls.

Let’s look at a cross-country that actually took place. A commercial applicant plotted a cross-country that took him from Pompano Beach, FL to Dillon, SC, and then to Winchester, VA. Two days later, the applicant departed Winchester and returned to Dillon, SC and then proceeded to Lakeland, FL. The next day he departed Lakeland for Pompano Beach, FL.

The examiner refused to accept this cross-country and a request was made for an official policy statement or legal interpretation. The following is the official FAA Flight Standards Service (AFS-800) policy stated for standardization purposes. This is not a “legal interpretation”.

**[Policy quote:]** “Ref. 61.129(a)(4)(i) and 61.1(b)(3)(ii); yes, this is a good cross country. The rule doesn’t address, nor care, if the pilot does remain over night/week/month cross-country. This cross-country can be counted for 61.129(a)(4)(i) purposes and also for 61.65(d)(1) purposes.

If my geography is correct, a cross-country flight from Pompano Beach to Virginia and return is a “... cross-country flight of not less than 300 nautical miles total distance.” And the first stop in South Carolina is “... at least is a straight-line distance of at least 250 nautical miles from the original departure point” (i.e., Pompano Beach, Florida). And the cross country flight involved “... landings at a minimum of three points...” (i.e.,

airport at South Carolina, Virginia, and Pompano Beach, Florida. Yes, the landing on the return trip back to Pompano Beach, Florida counts as one of the 3 required landings.” *[End of policy quote]*

Ok, we’re not through yet! Here is the other half of the question. If you can conduct this flight over time, (i.e., one night, three nights, two weeks, one months, etc.), then can you use cumulative flights to satisfy, for instance, the one flight requirement specified in 61.65(d)(2)(iii)?

Here is the official response: *[Policy quote:]* “Ref. 61.56(d)(2)(iii) and 61.1(b)(3)(ii). Once you have returned back to the original point of departure and begin new planning for a cross-country flight for the next day/week/month these become separate cross-country flights. Cross-country flights from the original point of departure even on consecutive days can not be “added together.” Let’s attempt to clarify what we mean.

An IFR training flight from an original point of departure to an airport 75 NM away and return to the original point of departure, with an instrument approach at each airport (150 NM total distance) can not be added to an IFR training flight the next day/week/month from the original point of departure to another airport 51 NM the other direction and return to the original point of departure with instrument approaches at each airport (total 101 NM distance) to attain the 250 NM required by 61.65(d)(2)(iii).” (Q&A #433). *[End of policy quote]*

Whew! That was a long sentence.

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## NEW NEW NEW NEW NEW NEW

**The Flight Instructor Instrument Practical Test Standards(PTS) for Airplane/Helicopter have recently been revised. The previous version, FAA-S-8081-9A, is now obsolete and has been replaced by FAA-S-8081-9B which was effective June 2001.**

The format now has the introduction included under the contents along with everything else.

The old task table or grid table used for the addition of and instrument rating to a flight instructor certificate has changed. See the new page 12 vs Roman numeral page XII in the obsolete version. A new task table is also available for the renewal or reinstatement of a flight instructor.

Under AREA OF OPERATION I: Fundamentals Of Instructing, notice the note has changed. The note now states that the examiner shall select at least TASK E, F, and G and one other task instead of just TASK E and one other TASK. If you have been using the old PTS routinely, then you will be in for some surprises.

The tasks themselves have changed. For example, Task E in the old PTS was Flight Instructor Characteristics And Responsibilities, but the new TASK E is titled Critique And Evaluation. Soooo..., review carefully and don’t assume anything.

AREA OF OPERATION II: Technical Subject Areas. The note in the old PTS required TASK E and at least one other task to be tested. In the new version, TASK A and D and at least one other task is required. TASK A is: Aircraft Flight Instruments And Navigation Equipment. TASK D: Logbook Entries Related To Instrument Instruction.

Lets continue to AREA OF OPERATION III: Preflight Preparation. This operation is basically unchanged.

AREA OF OPERATION IV: Preflight Lesson On A Maneuver To Be Performed In Flight. The note under this operation has also changed and has ended an old controversy. Here is the exact verbiage: The examiner shall select at least one maneuver from AREAS OF OPERATION VI through IX (different from the obsolete

version), and ask the applicant to present a preflight lesson on the selected maneuver as the lesson would be taught to a student. PREVIOUSLY DEVELOPED LESSON PLANS FROM THE APPLICANT'S LIBRARY MAY BE USED. Did I hear a HOORAH?

AREA OF OPERATION V: Air Traffic Control Clearances And Procedures. This Operation still has two tasks. TASK A: Air Traffic Control Clearances. This task has dropped from 6 to 5 elements. The element "compliance with an ATC clearance" was deleted.

TASK B: Compliance With Departure, En Route, And Arrival Procedures And Clearances. This task has added the following (3) elements bringing the total to (8):

Element 6: Pilot's responsibility for compliance with vectors and also altitude, airspeed, climb, descent, and airspace restrictions.

Element 7: Pilot's responsibility for the interception of courses, radials, and bearing appropriate to the procedure, route, or clearance.

Element 8: Procedures to be used in the event of two-way communications failure.

AREA OF OPERATION VI: Flight by reference to instruments.

This operation has (8) TASKS lettered A through H. The old PTS had two TASKS incorrectly labeled as "C". The new AREA OF Operation VI is completely realigned, requiring thorough review by examiners and instructors.

AREA OF OPERATION VII: Navigational systems.

The note requires the examiner to select TASK A and B. The old note only required the selection of at least one task, so heads up. The obsolete PTS required intercepting and tracking an NDB bearing. That task was replaced with TASK B: Holding Procedures. This confirms that ADF/NDB is slowly disappearing over the horizon.

AREA OF OPERATION VIII: Instrument Approach Procedures.

TASK A under this operation is titled: Non-precision instrument approach. Specific reference to ADF or NDB has been deleted. This operation has (5) TASKS.

AREA OF OPERATION IX: Emergency Operations. TASKS requiring the use of multiengine aircraft have been combined within this new operation. The note states that the examiner shall select at least one TASK. The examiner shall omit TASKS C and D unless the applicant furnishes a multiengine airplane for the practical test, then TASK C or D is mandatory.

AREA OF OPERATION X: Post flight Procedures.

Only one TASK in this final operation. It does not reflect a letter, but it's pretty obvious that it would be letter A.

**\* This article only offers a partial review of the new Flight Instructor Instrument PTS. It is strongly recommended that pilot examiners and instructors conduct their own thorough review.**

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***HELLO!*** IS ANYONE OUT THERE? **HELLO?** ***HELLOOOOOOOO ??????!***

**When we were mailing the DESIGNEE UPDATE we could not be certain that, once received, the publication was being read.**

**However, we did get telephone calls and occasional letters making comments or asking questions.**

**We are not getting significant responses now that the DESIGNEE UPDATE is only available on the Internet web site. If you are there and appreciate the effort, please send an e-mail to:**

**Paul.J.Maenza@faa.gov**