

John –

Pursuant to our conversation this morning regarding the authorized (approved) use of a Basic Aviation Training Devices (BATD) and an Advanced Aviation Training Device (AATD):

Approved Uses-

As stated in AC 61-136, BATDs and AATDs are approved for use in accordance with 14 CFR section (§) 61.4(c). In essence, § 61.4(c) states that the Administrator may approve a device, other than a flight simulator or flight training device, for specific purposes. BATDs and AATDs are essentially devices approved by the Administrator for specific purposes by way of a Letter or Approval/Authorization (LOA). Therefore, § 61.4(c) and the LOA are the regulatory basis for the authorized use of a BATD or an AATD.

Authorized Flight Instructor-

An authorized flight instructor only needs to be present and certify the use of a BATD or an AATD when the time being logged is for training (instruction) towards a pilot certificate or rating. 14 CFR § 61.51(g)(4) states- “A person can use time in a flight simulator, flight training device, or aviation training device for acquiring instrument aeronautical experience for a pilot certificate, rating, or instrument recency experience, 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.” The operative term is “training session”. Therefore, if a person is logging the time and experience necessary to maintain instrument recency experience [§ 61.57(c)(2)] and is not applying that time and experience towards a pilot certificate of rating, then an authorized instructor is not required to be present and certify same. The preamble to the August 2009 Part 61 Final Rule states- “An authorized instructor (See § 61.1(b)(2)) must be present in the FS, FTD, or ATD when instrument training time is logged for training and aeronautical experience for meeting the requirements for a certificate, rating, or flight review (See § 61.51(a)). The instructor must sign the person’s logbook verifying training time and session content.

That being said... as stated above, approved uses for a BATD and an AATD are governed by § 61.4(c) and the LOA. The LOA states that an authorized instructor must certify the instructional use. Simply satisfying the requirements of § 61.57(c)(2) is not considered instructional use, therefore an authorized instructor does not need to be present.

I hope that this provides the clarity you are seeking.

Regards,

Lance

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