



# RWR Pilot Training



## Malibu - Mirage - Meridian

*Insurance Approved, Type Specific Training Programs  
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### I'm Glad You Asked

### *Logging Flight Time*

By Dick Rochfort, ATP, MCFI, CFII, MEI

Logging flight time frequently generates heated discussion. The answers to many of these questions are found in the FAA regulations and legal interpretations. Here are some of the questions I frequently hear:

**Question:** What is Flight time anyway; is it the same as Hobbs time?

Answer: No, it is not. Hobbs time begins on the Malibu, Mirage and Meridian aircraft when the gear is up and oil pressure is alive. Both conditions are necessary and sufficient to run the Hobbs meter. It is what you should use to document your maintenance.

Flight time is defined in FAR 1.1 as follows: "Pilot time that commences when an aircraft moves under its own power for the purpose of flight and ends when the aircraft comes to rest after landing."

**QUESTION :** I was having trouble interpreting the regulations how simulator or flight training device time is logged. Regardless if it is being logged towards a pilot certificate or rating I wanted to know if the time spent in the sim or FTD can be logged towards total time in the logbook. When reading the regulation it doesn't specify that you can or can not. It states in part 61 that it is pilot time, but not how it is logged.

**ANSWER :** Ref § 61.51(h); NO. Simulator, flight training device and PCATD time CANNOT be logged as "flight time" and does not belong in a "Total Flight Time" column in your logbook. A good way to gain familiarity is to run scenarios using your own aircraft and a 60 AMP DC power supply (Jon Sisk sells them at Enhanced Flight Group). You can go over any avionics questions you may have with the book in your lap and maybe even Paul Sanchez on the cell phone!

**QUESTION :** I also wanted to verify that logging night time, NOT for currency requirement, is from sunset to sunrise.

**ANSWER :** Ref. Definitions, part 1, § § 61.51(b)(3)(i), 61.57(b) and 91.209. No. "Sunset-to-sunrise" is used per 91.209 in specifying when aircraft lighting is required. This is not the guidance for logging night flight time. Night flight time should be logged in accordance with the part 1 definition of "night." The definition specifies night as the "time between the end of evening civil twilight and beginning of morning civil twilight as published in the American Air Almanac." By "rule-of-thumb" the nighttime period starts about 30 minutes after sundown and ends about 30 minutes before sunrise. The twilight period varies slightly by latitude but is approximately 30 minutes in the "lower 48" & Hawaii. Astronomers or persons doing celestial navigation most commonly use an Air Almanac. Few pilots (except for Paul Himes) have even seen or used an Air Almanac.

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In 61.57(b), "One hour after sunset to one hour before sunrise" is the qualification to be met in logging landing currency qualification for being PIC when carrying passengers between an hour after sunset to an hour before sunrise. This is not the guidance for logging night flight time.

**Question:** I'm a little hazy (less than 3 miles) on the requirements for instrument currency. Can you explain it?

**Answer:** Simply put, for a person to remain instrument current to act as a PIC under IFR or in weather conditions less than the minimums prescribed for VFR, the pilot must always be able to look back over the preceding 6 calendar months and show having performed/logged six instrument approaches, holding procedures, and intercepting and tracking courses through the use of navigation systems. If the person has not performed/logged these required instrument currency tasks, then the person has 6 additional calendar months ". . . after the prescribed time . . ." to perform/log these instrument currency tasks, but the person cannot act as a PIC under IFR or in weather conditions less than the minimums prescribed for VFR. After that time has expired, the person must undergo an instrument proficiency check to get instrument recurrent.

**Question:** Can two pilots log PIC time on the same flight?

**Answer:** The short answer is yes. A letter of clarification from the FAA to David Reid follows. Please note that there is no mention of which seat you occupy.

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October 30, 1992  
Mr. David M. Reid

Dear Mr. Reid:

Thank you for your letter of June 12, 1992, concerning the logging of pilot in command (PIC) time under the Federal Aviation Regulations (FAR).

In your letter you ask four questions. First, you ask whether there are "any circumstances when, during a normal flight, two Private Pilots may simultaneously act as (and therefore log the time as) Pilot In Command?" The answer is two private pilots may not simultaneously *act* as PIC but they may, under certain circumstances, simultaneously log PIC time.

There is a difference between serving as PIC and logging PIC time. PIC, as defined in FAR 1.1, means the pilot responsible for the operation and safety of an aircraft during flight time. FAR 61.51 deals with logging PIC flight time, and it provides that a private or commercial pilot may log as PIC time only that flight time during which he is the sole manipulator of the controls of an aircraft for which he is rated, or when he is the sole occupant of the aircraft, or when he acts as PIC of an aircraft on which more than one pilot is required under the type certification of the aircraft, or the regulations under which the flight is conducted. It is important to note that FAR 61.51 only regulates the recording of PIC time used to meet the requirements toward a higher certificate, higher rating, or for recent flight experience.

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Therefore, while it is not possible for two pilots to act as PIC simultaneously, it is possible for two pilots to log PIC flight time simultaneously. PIC flight time may be logged by both the PIC responsible for the operation and safety of the aircraft during flight time in accordance with FAR 1.1, and by the pilot who acts as the sole manipulator of the controls of the aircraft for which the pilot is rated under FAR 61.51. Enclosed please find two prior FAA interpretations concerning logging of PIC time. We hope that these will be of further assistance to you.

In your second question you ask "how shall two Private Pilots log their flight time when one pilot is under the hood for simulated instrument time and the other pilot acts as safety pilot?" The answer is the pilot who is under the hood may log PIC time for that flight time in which he is the sole manipulator of the controls of the aircraft, provided he is rated for that aircraft. The appropriately rated safety pilot may concurrently log as second in command (SIC) that time during which he is acting as safety pilot.

The two pilots may, however, agree prior to initiating the flight that the safety pilot will be the PIC responsible for the operation and safety of the aircraft during the flight. If this is done, then the safety pilot may log all the flight time as PIC time in accordance with FAR 1.1 and the pilot under the hood may log, concurrently, all of the flight time during which he is the sole manipulator of the controls as PIC time in accordance with FAR 61.51(c)(2)(i). Enclosed please find a prior FAA interpretation concerning the logging of flight time under simulated instrument flight conditions. We hope that this interpretation will be of further assistance to you.

In your third question you ask "during instrument training, how shall a VFR Private Pilot log the following flight time: Pilot In Command time, Simulated Instrument time, and Actual Instrument time, when that pilot is... A)...under the hood? B)...in actual instrument conditions? C)...under the hood in actual instrument conditions?" The answer is the VFR private pilot may log all of the flight time you described as PIC flight time under FAR 61.51(c)(2)(i) if he was the sole manipulator of the controls of an aircraft for which he is rated. Under FAR 61.51(c)(4) the pilot may log as instrument flight time only that time during which he operates the aircraft solely by reference to instruments, under actual or simulated instrument flight conditions. Please note that the FARs do not distinguish between "actual" and "simulated" instrument flight time. Enclosed is a prior FAA interpretation concerning the logging of instrument flight time. We hope this interpretation will further assist you.

Finally you ask "does FAR 61.57 affect how the VFR Private Pilot shall log Pilot In Command time during instrument training, either before or after meeting the 6/6/6 requirement, and if so, how?" FAR 61.57 does not affect how a pilot logs PIC time during instrument training; FAR 61.51(c)(2) and (4) govern logging of instrument flight time. FAR 61.57(e) provides currency requirements for acting as PIC under instrument flight rules (IFR) or in weather conditions less than the minimums for visual flight rules (VFR). Enclosed please find a prior FAA interpretation on instrument flight time and FAR 61.57(e). We hope this interpretation will further assist you.

We hope this satisfactorily answers your questions.

Sincerely,

Donald P. Byrne  
Assistant Chief Counsel, Regulations Division

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*“I’m Glad You Asked” is a regular column written by Master Flight Instructor Dick Rochfort. Dick answers questions which come up frequently while conducting training in the Malibu, Mirage and Meridian aircraft. If you have a question for Dick, you can send it to him at [mail@rwrpilottraining.com](mailto:mail@rwrpilottraining.com). He’ll be ... “glad you asked”.*

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## Biography

### Richard W Rochfort



A former corporate pilot and primary flight instructor, Dick is a full-time Master Certified Flight Instructor providing insurance approved initial and recurrent pilot training in the Piper PA46 Malibu, Mirage, and Meridian aircraft. He is currently flying over 450 hours per year and trains 60-80 pilots every year exclusively in these aircraft.

He holds multi-engine ATP and Gold Seal Flight Instructor Certificates with CFII, MEI and CE-525S ratings. He has been actively involved in flight training since 1991 and has trained pilots all over the US, Canada and Europe.

Dick is an Aviation Safety Counselor for the FAA Baltimore FSDO, a National Industry Member of the FAA Safety Team (FAAST) and has conducted hundreds of programs for the pilot community. He is an instructor for the M/MOPA Safety and Training Foundation and The National Association of Flight Instructors has designated him Master CFI. Less than 1% of all flight instructors have earned this designation.

Dick served as a Staff Sergeant E6 in the US Army Special Forces from 1970 until 1976 as an A team radio operator, training indigenous personnel in field communications. He worked from 1976 until 1991 as an industrial engineer training manufacturing personnel for the production of communication and navigation equipment for US military.

His education includes undergraduate degrees in Clinical Psychology and Engineering and a Masters Degree in Business Administration. Dick lives in Baltimore, Maryland with his wife and two daughters. He is a PADI Certified Scuba Diving Instructor, First Aid Instructor and an Eagle Scout.

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