



U.S. Department
of Transportation

Federal Aviation
Administration

DEC 1 2009

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

Dwight B. Van Zanen

Dear Mr. Van Zanen:

This responds to your request for a legal interpretation faxed November 13, 2007. Your letter requests clarification of the definition of cross-country time under 14 C.F.R. § 61.1(b)(3)(ii)(B). This response is being issued simultaneously with legal interpretations to James Hilliard and Ted Louis Glenn, both of which address questions concerning logging cross-country time and are enclosed.

Your letter presents a scenario to illustrate your question about how a pilot may log cross-country time as defined in § 61.1(b)(3)(ii). In your example, a pilot wishes to fly from Airport A to Airport B, which is located 20 nautical miles (nm) to the south. The pilot then flies from Airport B to Airport C, which is located 60 nm north. The pilot then flies home a distance of 40 nm from Airport C to Airport A. You state that each of these flights had an independent purpose. If a pilot logged these flights as flight segments of one flight, that pilot would not be able to log any cross-country time because no segment includes a landing that is 50 nm from the original point of departure. You ask whether the pilot may log the flight from Airport A to Airport B as one flight and the flights from Airport B to Airport C to Airport A as flight segments of a second flight. If that method of logging were used, the pilot could log cross-country time for the second two flights because Airport C is more than 50 nm from Airport B, the original departure point for that flight.

Cross-country time is defined in § 61.1(b)(3)(ii) as time acquired during a flight that is conducted in an appropriate aircraft; "that includes a point of landing that was at least a straight-line distance of more than 50 nautical miles from the original point of departure"; and that involves the use of dead reckoning, pilotage, electronic navigation aids, radio aids, or other navigation systems to navigate to the landing point.

Section 61.1(b)(3)(ii) requires that a flight include a landing at a point other than the point of departure. As you correctly state in your letter, the definition does not require that any one leg of the flight be 50 nm but only that "at least one leg of the cross-country flight, however long by itself, must include a point of landing that is at least a straight-line distance of more than 50 nm from the original point of departure" of the flight. Legal Interpretation to E. Thomas Sisk (Mar. 18, 2008); *see also* Legal Interpretation to Alfred Tenuta, Jr. (Apr. 17, 1998). These interpretations allow a pilot to string together multiple legs to log a single cross-country flight. However, there is nothing in § 61.1(b)(3)(ii) or previous FAA

interpretations dictating how separate flights must be logged. Accordingly, the pilot may choose what is considered a flight and what is merely a segment of a flight, and then log that flight time appropriately when the flight is conducted. Accordingly, the pilot may log the flight from Airport A to Airport B as one flight (not logging cross-country time) and the flight from Airport B to Airport C to Airport A as a separate flight (logging cross-country time).

This response was prepared by Robert Hawks, an Attorney in the Regulations Division of the Office of Chief Counsel and coordinated with the Certification and General Aviation Operations Branch of Flight Standards Service. We hope this response has been helpful to you. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca B. MacPherson", with a stylized flourish at the end.

Rebecca B. MacPherson
Assistant Chief Counsel for Regulations, AGC-200

Enclosures