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FAA Commercial Pilot Logbook Requirements: Two 10-Hour Tests

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Executive Summary

This report audits a pilot's own logbook against the two different ten-hour tests inside 14 CFR 61.129 for an initial commercial pilot certificate, airplane category, single-engine class, under United States Part 61. The same number sits in two paragraphs with different inclusion rules, so one "ten hours" subtotal cannot serve both. Paragraph (a)(3)(ii) asks for ten hours of training in a complex airplane, a turbine-powered airplane or a technically advanced airplane (TAA) (14 CFR 61.129(a)(3)(ii)), and expressly allows "any combination" of the three (same paragraph). Paragraph (a)(4) asks for ten hours of solo flight time in a single-engine airplane, or ten hours performing the duties of pilot in command (PIC) with an authorized instructor on board (14 CFR 61.129(a)(4), solo alternative) (instructor-aboard alternative).

The two paragraphs are not the same set of hours. Ten hours in a glass-cockpit airplane is not automatically ten supported hours of the training that (a)(3)(ii) describes, because ordinary flights in the same airplane are not training entries. A subtotal that mixes solo and instructor-aboard time does not establish (a)(4). The FAA Chief Counsel's 2016 Grannis response says the pilot must choose to log all ten hours as solo or all ten as PIC duties with an instructor aboard (www.faa.gov), and its 2014 Kuhn response says the pilot performing PIC duties is not receiving instruction and cannot log the time as dual (www.faa.gov).

The report therefore proposes a two-ledger evidence table keyed to exact rule paragraphs. Ledger A holds only documented training entries for (a)(3)(ii), with aircraft configuration evidence read against paragraph (j), which lists a primary flight display, a multifunction display, an integrated two-axis autopilot and continuously visible elements (www.ecfr.gov) (www.law.cornell.edu). Ledger B keeps a solo sub-ledger and a duties-of-PIC sub-ledger apart. An entry that says only "instructor aboard" stays unresolved until the instructor, examiner or FAA answers. In the synthetic worked case, 6:00 of documented TAA training plus 4:00 of qualifying complex training gives 10:00 in Ledger A, while 6:00 solo plus 4:00 duties-of-PIC remain two separate subtotals that add to 10:00 arithmetically without establishing (a)(4).

The sources are dated. The eCFR page for 61.129 stated "up to date as of 11/19/2026" when retrieved (www.ecfr.gov), and Advisory Circular (AC) 61-65K is dated 14 November 2025 (www.faa.gov). No later FAA interpretation superseding Grannis or Kuhn was found, and the absence of a result is not proof of absence.

Electronic logbook reports apply vendor filters; ForeFlight documents that adding Dual time to the instructor-aboard flight prevents it appearing in its Commercial ASEL Report (support.foreflight.com). Such filters are vendor behavior, not regulatory approval. This is personal record-keeping, not operational guidance and not a guarantee that any application will be accepted; disputed equipment or credit questions belong with the instructor, examiner or FAA.

Introduction and Background

Pilots assembling their own records for a commercial certificate often work from a total-time column and report summaries. Section 61.129 also contains requirements that depend on how an entry was made, who was in the aircraft and what the flight was for. This report examines the two requirements that each use the number ten.

Scope. The analysis is limited to the United States, 14 CFR Part 61, an initial commercial pilot certificate with an airplane category and single-engine class rating, using the land or sea airplane appropriate to the rating sought. Part 141 approved courses, multiengine ratings and foreign-authority routes need separate analysis. For contrast only, the multiengine paragraph (b)(3)(ii) asks for training in a multiengine complex or turbine-powered airplane and does not carry the TAA option.

What the report is and is not. It is a retrospective logbook evidence audit. It does not recommend flight schools, describe careers, suggest that anyone fly additional hours, or give operational or training instructions. Where an entry cannot be classified from the record, the report says so and refers the question to the appropriate instructor, examiner or FAA office.

Why a ledger. Federal rules require each person to document and record training and aeronautical experience in a manner acceptable to the Administrator (www.ecfr.gov), and the pilot time described in 14 CFR 61.51 may be used to apply for a certificate or rating. A column label such as "Dual Received" or "PIC" is a logging category. Whether an entry supports a specific requirement is a separate question that depends on the rule paragraph, the aircraft, the instructor's role and the content of the lesson.

Publisher perspective. The publisher of this report, LANDING.AERO, makes Pilot Logbook, an invitation-only electronic pilot logbook. The classification review below is manual and can be done on paper, in a spreadsheet or in any electronic logbook; the final section explains where a personal-record printout fits beside it.

The Two Ten-Hour Requirements in the Current Rule

Where the hours sit in the 250-hour structure

The base requirement is that an applicant for an airplane single-engine commercial certificate log at least 250 hours of flight time as a pilot (14 CFR 61.129(a)). Inside that total, paragraph (a)(1) sets 100 hours in powered aircraft (14 CFR 61.129(a)(1)) and paragraph (a)(2) sets 100 hours of PIC flight time (14 CFR 61.129(a)(2)), alongside cross-country minimums; these are outside this comparison. Paragraph (a)(3) then asks for 20 hours of training on the areas of operation listed in 61.127(b)(1) (14 CFR 61.129(a)(3)). Paragraph 61.129 contains three ten-hour items: (a)(3)(i), (a)(3)(ii) and (a)(4). This audit compares the two that are easily conflated, (a)(3)(ii) and (a)(4), and notes (a)(3)(i) only to keep it separate.

- **(a)(3)(i), instrument training:** ten hours of instrument training using a view-limiting device (14 CFR 61.129(a)(3)(i)).
- **(a)(3)(ii), complex, turbine or TAA training:** ten hours of training in a complex, turbine-powered or technically advanced airplane (14 CFR 61.129(a)(3)(ii)).
- **(a)(4), solo or duties of PIC:** ten hours of solo flight time, or ten hours of flight time performing the duties of PIC with an authorized instructor on board (14 CFR 61.129(a)(4), solo alternative) (14 CFR 61.129(a)(4), instructor-aboard alternative).

The instrument-training item is a separate paragraph with its own hours, listed so that the three tens are not confused.

Can complex time count toward instrument training?

The rule lists instrument training in (a)(3)(i) and complex, turbine or TAA training in (a)(3)(ii) as separate subparagraphs with separate hour counts. None of the primary sources opened for this report states that one flight may or may not be counted in both items, and this report does not assert either answer. A logbook audit should therefore record the instrument-training and complex/TAA subtotals in separate columns and refer any proposed double use to the instructor or examiner, and to the FAA where the instructor and examiner disagree.

Paragraph (a)(3)(ii): the training ledger

The text counts "training", not flight time in a given airplane. Under 61.51(h), a person may log training time when receiving training from an authorized instructor (www.ecfr.gov), and the logged training time must be endorsed in a legible manner by the authorized instructor (www.law.cornell.edu). The same paragraph requires the instructor's signature, certificate number and certificate expiration date or recent experience end date (www.ecfr.gov).

The "any combination" wording is deliberate. In the 2018 final rule that added the TAA option, the FAA described the change as allowing technically advanced airplanes as an alternative to older complex single-engine airplanes (www.federalregister.gov), and it added wording to clarify that any combination of a complex airplane, turbine-powered airplane or TAA may be used (www.federalregister.gov). The 2018 notice kept the land-or-sea match, stating the airplane must be appropriate to land or sea depending on the rating sought (www.federalregister.gov). The Federal Register notice states that the TAA amendments to 61.129 were effective August 27, 2018 (www.federalregister.gov), and that the option to use a TAA was intended to apply to all commercial pilot applicants (www.federalregister.gov). AOPA's explainer summarizes the single-engine limit: any combination may be used, but only for the single-engine airplane rating (www.aopa.org).

A complex airplane is defined in 61.1(b) by its equipment: retractable landing gear, flaps and a controllable pitch propeller (www.ecfr.gov). Acting as PIC of a complex airplane also carries its own logbook endorsement under 61.31(e), a one-time endorsement from an authorized instructor who certifies proficiency (www.ecfr.gov). That endorsement is a different record from the training entries in Ledger A, and the audit should keep them apart.

Paragraph (j): what the TAA equipment check must cover

Paragraph (j) states that a technically advanced airplane must be equipped with an electronically advanced avionics system (www.ecfr.gov). The current paragraph lists a primary flight display (PFD) with six flight instruments: airspeed indicator, turn coordinator, attitude indicator, heading indicator, altimeter and vertical speed indicator (www.law.cornell.edu). It lists a multifunction display (MFD) with a GPS moving map showing the aircraft position. It lists a two-axis autopilot integrated with the navigation and heading guidance system, and it requires that the display elements be continuously visible (www.law.cornell.edu).

Three points follow for record-keeping. First, a model name or the label "glass" does not document these elements. Second, AOPA's explainer notes that the definition does not specify the source from which the PFD and MFD get their information (www.aopa.org), which means the audit should record what is installed, not infer it. Third, the FAA described its first draft of the definition as too prescriptive, and the final text is more flexible (www.federalregister.gov), so configuration evidence should be read against the current paragraph and not against older summaries. A photograph of a panel is not a certification of equipment eligibility. The audit holds configuration evidence; it does not decide eligibility.

AC 61-65K, paragraph 24, also says the Administrator can make a determination for airplanes that may not meet the paragraph (j) criteria (www.faa.gov), and that requests concerning TAA qualification should be forwarded to the FAA (www.faa.gov). This report does not decide any disputed equipment case on behalf of the FAA.

Paragraph (a)(4): two alternatives, not one pool

Paragraph (a)(4) offers an either-or. The first alternative is ten hours of solo flight time in a single-engine airplane. The second is ten hours of flight time performing the duties of pilot in command in a single-engine airplane with an authorized instructor on board (14 CFR 61.129(a)(4)). The paragraph also says either alternative may be credited toward the PIC flight time requirement under (a)(2). Paragraph (a)(4) then attaches a long cross-country flight and a night VFR item. Those sub-requirements are outside the two-ledger comparison and are tracked on their own lines.

The 2016 Grannis response answered the question of whether the alternatives may be mixed. The letter answers a Certified Flight Instructor's question dated February 25, 2016 (Grannis letter, request date). It states that the rule language is clear that a pilot must choose one alternative, that the pilot must choose to log all ten hours as solo flight or all ten as PIC duties with an instructor aboard (Grannis letter, holding), and that the FAA has specifically included alternative language elsewhere when it intends a combination to be allowed.

The 2014 Kuhn response addresses how the duties-of-PIC entry should look. It states that the pilot is not receiving instruction and therefore cannot log the time as dual (Kuhn letter, no dual), and that the logbook entry should reflect the provision under which the flight time is logged (Kuhn letter, logbook entry). On ordinary PIC logging for the pilot performing PIC duties, the letter ties the answer to the conditions of 61.51(e)(1)(i) and says that otherwise the pilot cannot log PIC time (Kuhn letter, PIC time). The instructor, by contrast, may log PIC time for the entire flight if rated to act as PIC of the aircraft. The pilot-side rule is that a commercial candidate may log PIC as sole manipulator only for an aircraft for which the pilot is rated (14 CFR 61.51(e)), so the audit must not assume every candidate may log sole-manipulator PIC.

Both letters answer their stated facts and neither is a rule. The FAA's interpretations page states that the Chief Counsel now accepts only requests presenting a novel or legally significant issue (www.faa.gov), so the audit treats Grannis and Kuhn as the FAA's reasoning on the facts presented, rechecked for supersession before each use.

Why identical numbers support different conclusions

Table 1 below sets the two requirements beside each other with the evidence each one needs. The table is a manual review aid. Its "recommended review fields" are suggestions for the person assembling the record. The mandatory logbook content is set by 61.51(b), which requires the person to enter the listed information for each flight or lesson logged, including the type and identification of the aircraft and the type of pilot experience or training such as flight and ground training received from an authorized instructor.

Rule paragraph	Purpose	Allowable combination	Source evidence to hold	Aircraft or configuration to document	Original logbook field	Ledger and subtotal
61.129(a)(3)(ii)	Ten hours of training in a complex, turbine-powered or technically advanced airplane	Any combination of the three airplane types	Instructor-signed training entry with lesson description and instructor certificate details	Complex: retractable gear, flaps, controllable pitch propeller. TAA: paragraph (j) elements	Dual or training received; aircraft ID	**Ledger A**: training minutes only
61.129(a)(3)(i) (contrast)	Ten hours of instrument training with a view-limiting device	Separate item; double use not addressed by the sources opened	Instrument entries consistent with 61.51(g)	Single-engine airplane for part of the hours; see the paragraph	Instrument and training fields	Own column, not merged with Ledger A
61.129(a)(4), solo alternative	Ten hours solo in a single-engine airplane	Not mixable with the PIC-duties alternative	Entry showing the pilot as sole occupant (www.law.cornell.edu)	Single-engine airplane	Solo	**Ledger B1**: solo minutes only
61.129(a)(4), duties-of-PIC alternative	Ten hours performing PIC duties with an instructor aboard	Not mixable with the solo alternative	Entry reflecting the actual basis; instructor identified	Single-engine airplane	PIC if the 61.51 conditions are met; not dual	**Ledger B2**: duties-of-PIC minutes only

Recommended review fields, which are a reviewer's convention and not mandatory 61.51 content, are:

- **Entry ID:** a stable label that ties each ledger row to the original page.
- **Evidence location:** where the scan, endorsement and instructor details are kept.
- **Configuration reference:** the document or note that records the equipment on that date.
- **Unresolved reason:** the specific missing fact, or "none".

The main message is in the last column. Three different subtotals result from the same logbook, and none of them is "total time in the aircraft". A pilot who knows only that ten hours were flown in a glass-cockpit airplane, with an instructor aboard for some of them, cannot tell which ledger, if any, the hours enter.

Building the Evidence Ledgers

Step 1: Inventory the original entries

Start from the original signed entries, not from a generated summary. For each flight, retain a scan or photograph of the page, the date, the aircraft identification and the instructor's name and certificate details where an instructor is involved. A printout or report is a view of that record, not the record.

- **Original entries:** the signed lines as written.
- **Instructor evidence:** the 61.51(h) elements, namely legible endorsement, signature, certificate number and expiration, a description of the training and the lesson length.
- **Aircraft configuration evidence:** what documents the installed equipment, kept as a record of the airplane's configuration on the date, not as a conclusion about eligibility.
- **Endorsements:** the 61.39 and 61.123 practical-test endorsements, which are separate from the hour ledgers (www.ecfr.gov).

Step 2: Assemble Ledger A for (a)(3)(ii)

Enter only entries that document training. For each, record the aircraft type, whether it is being offered as complex or TAA, the instructor evidence and the supported minutes. An ordinary flight in the same TAA without an instructor-signed training entry does not enter the subtotal merely because the airplane is advanced; the paragraph asks for training.

Electronic logbooks that mark aircraft as complex or TAA add a configuration tag, and ForeFlight's documentation says the entries count only if the selected aircraft is set up as complex or TAA (support.foreflight.com) and the time is logged as Dual Received (support.foreflight.com). ForeFlight also describes a per-aircraft TAA switch (foreflight.com) and says flights in a TAA-designated aircraft may be logged in lieu of, or in combination with, complex or turbine flights (foreflight.com). Its requirements article treats complex and TAA airplanes as one 10-hour training item (support.foreflight.com). These are product behaviors. A tag set by the user is the user's statement, so the audit compares it with the configuration evidence from Step 1.

Configuration evidence has to be tied to the date of the flight. An FAA-approved Airplane Flight Manual supplement is the kind of document that records an installed system; one Garmin-published supplement for a Mooney model describes the GFC 700 as a 2 axis autopilot and flight director system (static.garmin.com) controlled from the Multi-Function Display (static.garmin.com). That document concerns one airplane type and certifies nothing about another. A manufacturer's current page uses its own wording: Cirrus's SR Series page describes a PFD and MFD with split-screen windows (cirrusaircraft.com) and a digital three-axis autopilot (cirrusaircraft.com), which is the manufacturer's description of that model and not a paragraph (j) determination. MyFlightbook's FAQ treats complex and TAA status as an attribute of the airplane (myflightbook.com), lets a user flag a specific aircraft as TAA (myflightbook.com), accepts an upgrade date for

aftermarket installations (myflightbook.com) and notes that an aircraft may be TAA but out of compliance for a period of time (myflightbook.com). A time-dependent record of that kind is what the audit needs when an airplane's equipment changed during training.

Step 3: Assemble Ledger B in two separate sub-ledgers

B1 holds solo time. B2 holds duties-of-PIC time with an authorized instructor aboard. The two are never summed into one subtotal for the (a)(4) test, because the FAA's Grannis response says a combination is not permitted. Both sub-ledgers remain genuine recorded flight history. "Not established for this requirement" is not deletion and does not mean the time has no other value; for example, either alternative may be credited toward the PIC requirement in (a)(2).

For B2 the audit records that the entry reflects its actual basis. For the solo or PIC item, ForeFlight's requirements article says not to log Dual Received (support.foreflight.com). The Grannis letter reasons that neither the preamble nor the rule introduced language indicating that logging a combination was permitted (www.faa.gov). The Kuhn letter says the entry should reflect the provision under which the time is logged. ForeFlight's support article, last updated 7 February 2025, says the rule requires solo flight time or flight time performing the duties of PIC with an authorized instructor aboard (support.foreflight.com), and it advises not logging Dual time for the instructor-aboard flight because the instructor is not providing instruction (support.foreflight.com). Its guidance rests on the FAA regulation and interpretations, which is how this report uses it: as a documented vendor reading of the same two letters (support.foreflight.com).

Step 4: Separate total time, PIC, dual and requirement credit

Four different things are easy to confuse:

- **Total time:** every logged flight counts here.
- **PIC time:** governed by 61.51(e). A pilot who is a sole occupant may log PIC time in the circumstances the rule lists, and the solo definition in 61.51(d) concerns flight time when the pilot is the sole occupant of the aircraft (www.law.cornell.edu).
- **Dual received:** training received from an authorized instructor.
- **Requirement credit:** a conclusion about a specific paragraph, reached only after the entry, evidence and rule have been compared.

AOPA's explainer adds that a pilot acting as PIC of a complex airplane still needs ground and flight training and an endorsement (www.aopa.org). Neither "instructor present" nor "dual received" proves that training occurred in the sense of (a)(3)(ii), and neither "instructor aboard" nor "PIC" proves duties-of-PIC time in the sense of (a)(4). An instructor's presence is a fact; the purpose of the flight is a separate fact that the entry and the instructor's own records must supply.

Step 5: Inspect the printout or report against source entries

Generated reports can help, but each line should be traced back to the signed original. ForeFlight's July 2026 release page describes review of qualifying and non-qualifying flight entries from within its progress report (foreflight.com), and its support article states that adding Dual time or omitting the instructor from the crew fields prevents the time from being included in the Commercial ASEL Report (support.foreflight.com). A

practitioner resource from Pack Flight Services calls the answer to the mixing question a categorical no (www.packflightservices.com) and names the 2016 and 2014 letters (www.packflightservices.com). A MyFlightbook post from May 2018 says MyFlightbook enforces the complex-or-turbine training item in computing progress (myflightbookblog.blogspot.com); it predates the TAA option.

Reports may apply a stricter or looser filter than the rule, so for each printout line the audit asks which original entry it is and which ledger it belongs to.

Worked Synthetic Cases (Hypothetical Examples)

The cases below are synthetic. They are not benchmark data, they describe no real pilot, and the entry identifiers are invented. Each assumes the stated evidence has been verified against the original records.

Case 1 (Hypothetical Example): Ledger A. Three entries documenting TAA training total 6:00 (H-01, H-02, H-03). Two entries documenting qualifying complex-airplane training total 4:00 (H-04, H-05). Each has an instructor-signed training entry with a lesson description, and the configuration record for the TAA shows each paragraph (j) element. The Ledger A subtotal is 6:00 plus 4:00, which is 10:00 in the (a)(3)(ii) ledger. A further 1:30 flight in the same TAA (H-06) has no instructor-signed training entry. It stays in total time and, if the pilot is entitled to log it, in PIC time, and it contributes 0:00 to Ledger A.

Case 2 (Hypothetical Example): Ledger B. Two solo entries total 6:00 (H-07, H-08). Two duties-of-PIC entries with an authorized instructor aboard total 4:00 (H-09, H-10). The arithmetic sum is 10:00, but it does not establish (a)(4) under the Grannis response. B1 stands at 6:00 of 10:00 and B2 at 4:00 of 10:00. Both are genuine recorded history; "not established for this requirement" is a statement about (a)(4), not a deletion and not a claim that the flights have no value elsewhere.

Case 3 (Hypothetical Example): the unresolved entry. Entry H-11 reads only "instructor aboard", 1:30. It could be dual received, a duties-of-PIC flight or something else. Until its actual purpose and supporting evidence are established it sits in an "unresolved" row, and the signed entry is not rewritten to reach a desired subtotal. Whether it can be classified is a question for the signing instructor, the examiner and, if disputed, the FAA.

Table 2 below lays the cases out entry by entry, with minutes so the totals can be checked: 120 + 150 + 90 + 150 + 90 = 600 for Ledger A, and 210 + 150 = 360 solo plus 150 + 90 = 240 duties-of-PIC for Ledger B.

Entry ID (synthetic)	Original signed wording	Solo, instructor-present or actual-training evidence	Intended requirement	Supported minutes	Unresolved reason
H-01	"Dual received, TAA, commercial maneuvers" 2:00	Instructor endorsement present; configuration record on file	(a)(3)(ii)	120 (Ledger A)	None
H-02	"Dual received, TAA" 2:30	Instructor endorsement present; configuration record on file	(a)(3)(ii)	150 (Ledger A)	None

Entry ID (synthetic)	Original signed wording	Solo, instructor-present or actual-training evidence	Intended requirement	Supported minutes	Unresolved reason
H-03	"Dual received, TAA" 1:30	Instructor endorsement present; configuration record on file	(a)(3)(ii)	90 (Ledger A)	None
H-04	"Dual received, complex airplane" 2:30	Instructor endorsement present; complex equipment recorded	(a)(3)(ii)	150 (Ledger A)	None
H-05	"Dual received, complex airplane" 1:30	Instructor endorsement present; complex equipment recorded	(a)(3)(ii)	90 (Ledger A)	None
H-06	"Local flight, TAA" 1:30	No instructor, no training description	(a)(3)(ii)	0	Not a training entry
H-07, H-08	"Solo" 3:30 and 2:30	Sole occupant recorded	(a)(4) solo	360 (B1)	None
H-09, H-10	"PIC, instructor aboard, instructor named" 2:30 and 1:30	Instructor identified; entry states PIC duties, not dual	(a)(4) duties of PIC	240 (B2)	None
H-11	"Instructor aboard" 1:30	Purpose not stated	Unknown	0	Actual purpose and evidence unestablished; ask the instructor or examiner

In *Table 2* the 600 minutes in Ledger A and the 600 minutes in the arithmetic sum of B1 and B2 are different kinds of 600. The first is one paragraph's combinable training set. The second is two incompatible alternatives that happen to add to the same figure. H-11 contributes nothing to either ledger until a person with authority resolves it.

Data Analysis and Evidence

Ledger arithmetic in the synthetic case

The statutory hour figures appear once, in the section on the 250-hour structure, and are current as of the eCFR statement of 11/19/2026. This section quantifies the synthetic entries in *Table 2*, which are illustrations and not data about real pilots.

- **Recorded time in the sample:** 1,380 minutes (23:00) across entries H-01 to H-11.
- **Ledger A, (a)(3)(ii):** 600 minutes (10:00), or 43.5 percent of recorded minutes, all from instructor-signed training entries.
- **Ledger B1, solo:** 360 minutes (6:00), or 26.1 percent, which is 60 percent of the ten-hour alternative.
- **Ledger B2, duties of PIC:** 240 minutes (4:00), or 17.4 percent, which is 40 percent of the ten-hour alternative.
- **In neither ledger:** 180 minutes (3:00), or 13.0 percent: H-06 (90 minutes, not a training entry) and H-11 (90 minutes, purpose unestablished).

The B1 and B2 percentages are not additive toward (a)(4). Adding them gives 100 percent of ten hours only if the two alternatives are pooled, which the Grannis response does not permit. No public benchmark of how often real records fail these tests was found, and none is invented here. The report claims no rejection rate, tolerance or time saving.

Source types and dates

Table 3 below separates three kinds of source that audits often blur: the current regulatory text, historical interpretation and vendor report behavior. Dates are those stated by each source; retrieval was 21 November 2026.

Source	Type	Document or as-of date	What it supports	Limit
eCFR 14 CFR 61.129	Current regulation	Page current as of 11/19/2026	The two ten-hour paragraphs and the TAA definition	Text, not an equipment ruling
eCFR 14 CFR 61.51	Current regulation	Title 14 last amended 11/10/2026 (www.ecfr.gov)	Logbook content, solo, PIC, training entries (www.ecfr.gov)	Column labels do not by themselves establish requirement credit
AC 61-65K	FAA guidance	14 November 2025 (www.faa.gov)	Context for the training item; TAA determinations go to the FAA (www.faa.gov)	Guidance, not a determination for your airplane
Grannis letter	Historical interpretation	Response to a request dated 25 February 2016	Alternatives in (a)(4) are not combined	Answers the facts stated; recheck for supersession
Kuhn letter	Historical interpretation	2014 (the date stamp in the retrieved copy is not fully legible)	Duties of PIC is not dual received	Answers the facts stated
Dean letter	Historical interpretation	February 2013 (predates the 2018 TAA rule)	Complex training for the item may be in a single- or multi-engine airplane (www.faa.gov)	Pre-TAA background only, not relied on in the audit steps; apply with care
ForeFlight support articles	Vendor report filter	Last updated 7 and 10 February 2025	Dual Received and aircraft-tag filters (support.foreflight.com)	Vendor behavior, not approval
ForeFlight progress guidance	Vendor feature page	July 2026	Review of qualifying and non-qualifying entries (foreflight.com)	Vendor behavior, not approval
MyFlightbook post	Vendor blog	4 May 2018	Historical enforcement of complex or turbine item (myflightbookblog.blogspot.com)	Predates the TAA option
AOPA TAA explainer	Association explainer	Undated (2025 copyright)	Plain-language TAA definition (www.aopa.org)	Links an older point-in-time eCFR copy
Pilot Logbook (publisher's product)	Personal record and printouts	Public page viewed 3 and 21 November 2026	Custom summaries, totals by type and FAA-style PDF or Word printouts; invitation-only	No 61.129 two-path checker or FAA approval is established

The last column carries the most weight: each source answers a narrower question than the one a pilot is tempted to ask of it. Vendor entries describe what reports do with entries, which depends on how the user tagged aircraft and columns.

Supersession check

Searches for any later FAA legal interpretation or policy revising Grannis or Kuhn on 61.129(a)(4), or addressing (a)(3)(ii) and TAA training directly, returned nothing newer than the letters above. The searches covered the FAA interpretations page and general web results, not the FAA's Dynamic Regulatory System database. This is weak evidence; a reader preparing an application should recheck and keep the date of that recheck.

Handling Unknown Evidence and Questions for the Instructor or Examiner

Not every historic entry will carry enough evidence. The audit's job is to label the gap, not to fill it.

- **Entry says only "instructor aboard":** unresolved. Ask the signing instructor what the flight was for and whether the instructor's own records support that.
- **Entry says "dual" in a TAA but has no lesson description:** the 61.51(h) elements include a description of the training and the lesson length, so the audit marks the description as missing and asks the instructor.
- **Aircraft configuration unknown:** record the registration and the evidence sought. Equipment questions and any determination outside the paragraph (j) criteria go to the FAA.
- **Complex airplane and endorsement unclear:** the 61.31(e) endorsement and the Ledger A training entries are separate records.
- **Signed entries:** do not alter a signed entry retrospectively to produce a subtotal; a correction is a matter for the instructor who signed it.
- **PIC eligibility uncertain:** the pilot's entitlement to log PIC depends on the 61.51(e) provision that applies; the audit does not assume it.

Practical-test readiness has its own record layer. The applicant must have an endorsement in the logbook or training record if the part requires one, must have received and logged training within the two calendar months before the month of application, and must meet the aeronautical experience requirements of the subpart. AC 61-65K paragraph 14 describes the endorsement as certifying that the applicant received and logged the required flight time or training. The examiner and the instructor decide what they accept; the ledger helps both see the same evidence. One training-provider guide notes that the examiner will look at the logbook before the checkride (pilotinstitute.com) and shows a sample remark that states the dual instruction and identifies the aircraft and avionics (pilotinstitute.com).

Retaining a Dated Evidence Snapshot

The snapshot recommended here is a set of review fields, not a federal requirement.

- **Rule snapshot:** the eCFR retrieval date and the currency statement shown on the page.
- **Interpretation snapshot:** each letter, its date, and the recheck date.
- **Ledger A and Ledger B (B1 and B2):** entry identifiers, original wording, evidence, supported minutes and the unresolved reason.
- **Configuration record:** the equipment evidence for each TAA entry, kept with the date.
- **Printout comparison and open questions:** the report date, the entries compared, who was asked and what was answered.

Where Pilot Logbook fits

Pilot Logbook's public page describes custom summaries, totals by type, configurable headings and FAA-style layouts that print as PDF or Word. In this workflow the printout is a clean copy of the personal record to set beside the manual ledger, in the same way a paper logbook page or an exported spreadsheet would be. It is invitation-only, and interested readers can request an invite. It does not provide an automated eligibility decision for either ten-hour requirement, and a familiar authority layout does not establish that any examiner or authority accepts a given printout. The classification in Ledger A and Ledger B remains a human judgment, supported by the rule text and by the instructor or examiner.

Implications and Future Directions

For pilots and instructors. The two-rule structure moves the audit from a single number to a classification. A TAA hour, a complex hour, a solo hour and a duties-of-PIC hour are different evidence types, and entries that state their basis help later readers.

Open questions. In the searches run, the FAA's interpretations have not been updated for the 2018 TAA option on the points discussed here. AOPA notes that a TAA may have fixed landing gear and a fixed-pitch propeller (www.aopa.org), one reason the audit records configuration rather than assuming a type. Readers should watch the eCFR amendment history and the FAA's interpretations page for changes. No measured trend in demand for this topic is claimed.

Frequently Asked Questions (FAQs)

What does 61.129 require for commercial pilot aeronautical experience? For an airplane single-engine applicant, 250 hours of flight time as a pilot, with sub-requirements for powered aircraft, PIC, cross-country, training and the (a)(4) items.

Is ten hours in a glass-cockpit airplane enough for the complex/TAA item? Not by itself. The item counts training, and the airplane must meet the paragraph (j) elements to be a TAA. Non-training flights do not automatically enter the subtotal.

Can complex time count toward instrument training? The sources opened list them as separate paragraphs and state no answer on double use. Ask the instructor or examiner.

Can solo and duties-of-PIC time be combined for (a)(4)? The Grannis response says the pilot must choose one alternative.

Is duties-of-PIC time dual received? The Kuhn response says no, because the pilot is not receiving instruction.

Who decides whether an airplane is a TAA? The paragraph (j) definition applies, and AC 61-65K says TAA qualification requests go to the FAA.

Does an electronic logbook report prove that a requirement is met? No. A vendor report is a vendor filter. The signed original and the examiner's decision control.

Conclusion

The two ten-hour requirements in 14 CFR 61.129 for an initial single-engine commercial certificate share a number and little else. Paragraph (a)(3)(ii) is a combinable training set that can include complex, turbine-powered and technically advanced airplane training. Paragraph (a)(4) is an either-or between ten solo hours and ten duties-of-PIC hours with an instructor aboard, and the FAA's Grannis response says they are not mixed.

The audit is manual. It starts from the original signed entries, keeps Ledger A, B1 and B2 apart, records configuration evidence and unresolved questions, and retains a dated snapshot of the rule and interpretations used. Disputed equipment and credit decisions stay with the instructor, the examiner and the FAA. Recorded flights stay in the logbook whatever their classification; "not established for this requirement" describes the ledger, not the flight. Nothing here replaces an instructor's endorsement, an examiner's decision or the FAA's own determination.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

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