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Flight Instructor Logbook Endorsements: A 61.189 Register

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Executive Summary

A United States flight instructor keeps **two different personal records**, and an hours column serves only one of them. The first is the instructor's aeronautical experience, which 14 CFR 61.51 requires to be recorded "in a manner acceptable to the Administrator" (www.ecfr.gov). The second is the endorsement record in 14 CFR 61.189(b), which must hold the name of each person whose logbook the instructor endorsed for solo flight and the endorsement date (www.govinfo.gov), plus, for each knowledge-test or practical-test endorsement, the kind of test, the date and the results (www.law.cornell.edu). Paragraph (c) sets a floor of **at least 3 years** of retention (www.govinfo.gov), and paragraph (b) allows the record to live "in a logbook or a separate document" (www.law.cornell.edu). The electronic CFR (eCFR) displayed this text as current to 10 November 2026 (www.ecfr.gov).

Three findings shape a practical register. First, a student's signed logbook is the student's evidence, not the instructor's: 61.189(a) requires the instructor to sign the logbook of each person trained (www.law.cornell.edu), while the Federal Aviation Administration (FAA) Chief Counsel has said the instructor must keep personal records of endorsements, separate from an employer's recordkeeping (www.faa.gov). Second, Advisory Circular (AC) **61-65K**, dated **14 November 2025** (www.faa.gov), is "not legally binding in its own right" (www.faa.gov), and it does not cite 61.189, so its sample wording cannot stand in for the rule's fields. Third, the electronic logbooks reviewed document endorsements unevenly: ForeFlight's support pages state that auto-export CSV files exclude endorsements (support.foreflight.com), and LogTen states that its flight spreadsheet export omits signatures (support.logten.com).

The report proposes a printable register that separates the four items the rule requires (recipient, event date, test kind, result) from suggested linkage, privacy and backup controls. A three-row synthetic register, labeled hypothetical, covers a solo endorsement, a test recommendation awaiting its outcome and a ground-only lesson. A separate worked calculation of five synthetic sessions shows that its three flights total **3.6 hours** of aircraft time, while two endorsements, a 1.0 hour ground lesson and a 0.8 hour simulator session add nothing to that total.

One question stays open: no official text reviewed says what event starts the 3-year clock, so the register leaves its retention review date blank instead of computing a deadline. For scale, the FAA counted **145,538** active flight instructor certificates at 31 December 2025, up from **138,127** a year earlier (www.faa.gov). This is an explainer on records, not legal advice or operational guidance.

Introduction and Background

Working instructors in the United States, including airline and charter pilots who instruct part time and professionals building experience, tend to treat "the logbook" as one object: hours, student signatures, and the thing an examiner asks to see. 14 CFR Part 61, the FAA's pilot and instructor certification rule set, treats three records separately: the pilot's own logged time, the instructor's signature in each trainee's logbook, and the instructor's own retained record of certain endorsements. This report concerns **the third**.

The decision it supports is narrow: can an instructor's personal records reproduce, on request, the endorsements issued and the outcomes of tests recommended, rather than assuming an hours column or a student's signed logbook is enough? It gives no school, employer or career advice and no universal library of endorsement wording. Every rule named is United States federal law (14 CFR, the Code of Federal Regulations Title 14). Transport Canada, the European Union Aviation Safety Agency and other authorities have their own instructor-record rules, which are not addressed.

Sources are separated by weight. Binding law is the regulation text; the eCFR describes itself as "authoritative but unofficial" (www.ecfr.gov), and the official annual CFR edition on govinfo.gov was also read. FAA advisory circulars and Chief Counsel letters are guidance or interpretation. Vendor pages are cited only for what a vendor says about its own product, and no product is declared compliant on the strength of marketing.

The publisher, LANDING.AERO, makes **Pilot Logbook**, an invitation-only electronic logbook for professional pilots. By the publisher's own description, it is a personal flight-time logbook with totals, editable columns and remarks, export and print layouts. It does not advertise a 61.189 register, so the register proposed here is a separate paper or spreadsheet document that sits beside any logbook, that one included. Rule text comes from the eCFR, Cornell's Legal Information Institute and govinfo.gov; vendor statements come from each vendor's own pages, retrieved on 15 November 2026.

Two Records, Two Purposes

The aeronautical experience record

This record answers "what time did this instructor fly, and in what capacity?" The governing rule, **14 CFR 61.51**, requires each person to document specified time "in a manner acceptable to the Administrator" (www.law.cornell.edu). Entries include total flight time or lesson time and the type and identification of the aircraft, full flight simulator, flight training device or aviation training device (www.ecfr.gov). A certificated flight instructor may log pilot-in-command time for all flight time while serving as the authorized instructor, if rated to act as pilot in command of that aircraft (www.ecfr.gov).

Its unit is the flight or lesson and its output is a total. "Dual given" is the common name for time flown as an instructor: LogTen defines its Dual Given field as "time flown as an instructor" (support.logten.com), and ForeFlight's guide describes the same field in similar terms. The phrase does not appear in 61.189; it is a column heading in apps and paper logbooks.

The endorsement record

This record answers "what did this instructor certify for whom, when, and what happened next?" Paragraph (a) of **61.189** is a duty to sign: the instructor must sign the logbook of each person given flight or ground training (www.law.cornell.edu). Paragraph (b) is a duty to keep a record "in a logbook or a separate document" (www.law.cornell.edu). Paragraph (c) is a duty to retain it for **at least 3 years** (www.govinfo.gov).

Because the rule permits a separate document, nothing in its text requires the hours logbook to carry the endorsement record. The Aviation Instructor's Handbook says endorsement records must be kept for at least 3 years (www.faa.gov), and an Aircraft Owners and Pilots Association (AOPA) attorney's article adds, as commentary rather than law, that the record can be "paper, electronic or both" (pilot-protection-services.aopa.org).

Why the two records fail differently

An hours record can be correct while the endorsement record is empty, and the reverse. A lesson can be logged as 1.4 hours of dual given with no endorsement issued. A solo endorsement can be issued on a day with no flight. A test recommendation produces an outcome days or weeks later that never touches a flight-time column. A 2010 FAA Chief Counsel letter traces the purpose of the instructor's record to better records of student instruction (www.faa.gov), which is evidence of what was certified, not how long anyone flew. The Flight Instructor Airplane Airman Certification Standards (ACS) test the distinction: Area of Operation II, Task K is "Endorsements and Logbook Entries", and its knowledge element K6 lists "Required flight instructor records" (www.faa.gov).

A student's signed logbook is not the instructor's record

For student solo flight, the rule requires the instructor to endorse the student pilot's logbook for the specific make and model (www.ecfr.gov). The instructor's own copy of the facts must exist independently. The 2015 FAA Chief Counsel reply to a Part 142 training-center question states that the instructor "must maintain his or her own personal records of endorsements" (www.faa.gov).

What 14 CFR 61.189 Requires, Field by Field

Table 1 below maps each duty in 61.189 to a register field and marks whether the rule requires it or this report suggests it.

61.189 element	What the rule text says	Register field	Required by rule or suggested
(a) Sign recipient's logbook	The instructor must sign the logbook of each person given flight or ground training (www.law.cornell.edu)	Lesson or flight ID, link to signed entry	The signature in the recipient's log is **required**; the instructor's own link to it is **suggested**

61.189 element	What the rule text says	Register field	Required by rule or suggested
(b)(1) Solo endorsements	Name of each person whose logbook was endorsed for solo flight privileges, and the date (www.govinfo.gov)	Recipient name or identifier; issued date; endorsement category	**Required**: name and date. Category is suggested
(b)(2) Test endorsements	Name of each person endorsed for a knowledge or practical test, with the kind of test, date and results (www.law.cornell.edu)	Recipient; test kind; date; recorded result	**Required**: name, kind, date, results
(b) Medium	A logbook or a separate document (www.law.cornell.edu)	Register location and format	The rule permits either
(c) Retention	At least 3 years (www.law.cornell.edu)	Retained-through review date	The floor is **required**; the start event is not stated in the sources reviewed
Not in the rule	Evidence location, source or version, verification status, privacy and backup controls	Evidence location; source or version; verification status	**Suggested** only

Table 1 shows how little the regulation dictates. **Four items** are mandatory content: who, solo or test, the date, and for tests the kind and the results. Everything else is design choice. The AC's samples carry more elements, such as the instructor's certificate number and recent-experience end date, but those belong to the endorsement as written in the recipient's logbook (www.faa.gov), not to the instructor's retained record.

The text has also changed. The official 2012 CFR edition required the name of each person whose "logbook or student pilot certificate" the instructor endorsed (www.govinfo.gov); the 2025 edition keeps only the logbook (www.govinfo.gov). The Federal Register explained that because the student pilot certificate would be plastic, instructors would endorse only logbooks (www.federalregister.gov), effective April 1, 2016 (www.federalregister.gov). Commentary written before that date, including the 2010 FAA letter, quotes the older text.

Events that trigger a record

An endorsement the instructor issues triggers a record, not a lesson. The following events create or change an entry:

- **Solo endorsement issued.** Student solo flight requires an endorsement from an instructor who gave the training within the **90 days** preceding the flight (www.ecfr.gov), for the specific make and model. The AC separates the first 90-day period (A.6) (www.faa.gov) from each additional period (A.7).
- **Solo cross-country endorsements.** The rule requires a solo cross-country endorsement from the instructor who conducted the training (www.ecfr.gov) and a per-flight endorsement after reviewing the planning, for which the AC provides sample wording (A.10).
- **Knowledge-test endorsement.** 14 CFR 61.35 requires the applicant to have received an endorsement, if Part 61 requires one, from an authorized instructor certifying completion of the required ground training or home-study course (www.ecfr.gov).

- **Practical-test recommendation.** 14 CFR 61.39 requires an endorsement that the applicant received and logged training within **2 calendar months** before the month of application (www.ecfr.gov), in a logbook or training record signed by an authorized instructor.
- **Retest recommendation.** After a failure, 14 CFR 61.49 requires an endorsement from an instructor who gave additional training (www.ecfr.gov), and the AC says each retest needs a new recommendation on FAA Form 8710-1 or 8710-11 (www.faa.gov).
- **Outcome received.** The result of a recommended test arrives later and updates an existing entry.

What the rule omits is informative. A 2010 FAA letter, written under the pre-2016 text, said instructors must at minimum keep solo endorsements required under 14 CFR 61.87 and "should" keep a record of all solo-related endorsements (www.faa.gov), and 2006 AOPA commentary says there is no requirement to keep all of an instructor's training activities in a separate record (www.aopa.org). Instructors may log more than the minimum; this report marks such rows as suggested.

What the AC says, and what it does not

AC 61-65K, "Certification: Pilots and Flight and Ground Instructors", is dated 14 November 2025 and cancels AC 61-65J of 30 October 2024 (www.faa.gov). It states that conformity is "voluntary only" and describes its endorsements as samples for logbooks "or other means found acceptable to the Administrator" (www.faa.gov). Its one reference to an instructor-side record is sample endorsement A.14, the Transportation Security Administration citizenship endorsement, to be made in the student's logbook and in "the instructor's logbook or other record used to record flight student" endorsements (www.faa.gov), with a 5-year alternative of keeping citizenship documents. Instructors should take fields from the rule and wording from the AC, and keep the AC's 5-year citizenship option distinct from the 3-year floor in 61.189(c).

Linking Lessons, Endorsements and Test Outcomes

Why linkage is suggested, not required

The rule asks for names, dates, test kinds and results. It does not ask the instructor to prove a flight preceded an endorsement. Linkage still helps, because 61.87 ties the solo endorsement to training within the preceding 90 days (www.ecfr.gov) and 61.39 ties a practical-test endorsement to training logged within 2 calendar months (www.ecfr.gov). A related lesson ID lets the instructor reconstruct that chain without opening a student's book, and the training, the endorsement and the later flight can fall on three different days.

A synthetic register (Hypothetical Example)

Table 2 below shows three synthetic rows. All names, identifiers, dates and aircraft are invented, and no row describes a real person. The columns separate rule-required content (recipient, issued date, test kind, result) from suggested linkage and control fields.

Row	Recipient ID or name	Endorsement category	Issued date	Test kind	Recorded result	Evidence location	Related flight or lesson ID	Source or version	Verification status	Retained-through review date
R-001	S-0147 (Student A)	Solo endorsement, make and model as written in the student's logbook	2026-10-12	Not applicable	Not applicable	Student's logbook page (copy scanned to folder S-0147)	F-002	Wording from AC 61-65K A.6 or A.7 as applicable	Copy checked against original on issue date	Not set (start event unresolved)
R-002	S-0212 (Student B)	Practical-test recommendation	2026-10-19	Private pilot practical test, airplane	**Pending: outcome not yet received**	Recommendation block on FAA Form 8710-1 and endorsement text in the student's logbook	F-005	AC 61-65K sample wording	Awaiting outcome documents from the student	Not set (start event unresolved)
R-003	S-0147 (Student A)	None issued: ground lesson signature only	2026-10-20	Not applicable	Not applicable	Signed entry in the student's logbook	L-003 (ground lesson, 1.0 hour)	Not applicable	Signature confirmed	Not applicable (not a 61.189(b) event)

Table 2 shows three behaviors. R-001 meets the rule's solo fields with a name and a date; its other fields are the instructor's own aids. R-002 keeps the test kind and date but leaves the result visibly unresolved. The rule says the record "shall also indicate" the results (www.law.cornell.edu), and the sources reviewed do not say how to record an outcome not yet reported, so the register preserves the unresolved fact in plain words instead of guessing. R-003 is deliberately not an endorsement: a ground lesson requires the instructor's signature in the trainee's logbook under 61.189(a) (www.law.cornell.edu), but creates no 61.189(b) entry, so it appears only as a linkage row.

Recording a test outcome after the fact

For test recommendations, the outcome arrives in documents the applicant holds. The ACS names three practical-test outcomes, one being a Notice of Disapproval of Application. On a retest the applicant presents the original notice of disapproval or letter of discontinuance to the examiner, and the AC says the applicant must present another instructor endorsement (www.faa.gov).

None of those documents is addressed to the recommending instructor, so a register needs a deliberate way to learn the result. Suggested controls are a status value ("pending", "result received", "result not obtainable") and an evidence location for whatever the applicant provides. No official source reviewed specifies the form of the "results" entry or whether a failed result is recorded differently from a pass. Writing exactly what was learned, with the date, preserves the facts without asserting more.

Why the result matters beyond the record

Recorded outcomes have a second use. One flight instructor recent-experience route under 14 CFR 61.197 is endorsing at least **5** practical-test applicants in the preceding **24 calendar months** with at least **80 percent** passing on the first attempt (www.ecfr.gov), documented "in a form and manner acceptable to the Administrator". The AC repeats the route, and FAA Safety Team training material on the no-expiration rule lists the same threshold (www.faasafety.gov). A register that records results lets an instructor test that arithmetic from their own files. Since December 2024 a new instructor certificate carries no expiration date (www.ecfr.gov), while older certificates expire 24 calendar months from the month of issue, renewal or reinstatement, so the recent-experience date now appears in many signature lines.

Ground and Simulator Sessions Without Invented Aircraft Time

What the rules call each activity

14 CFR 61.1 defines "flight training" as training, other than ground training, received from an authorized instructor in flight in an aircraft (www.ecfr.gov), and "ground training" as training other than flight training. It defines "pilot time" more broadly, to include giving training as an authorized instructor in an aircraft, full flight simulator, flight training device or aviation training device (www.ecfr.gov). "Flight time" in 14 CFR 1.1 is pilot time that starts when an aircraft moves under its own power for the purpose of flight and ends when it comes to rest after landing (www.ecfr.gov).

A ground lesson or simulator session is therefore real instruction and may be loggable under the applicable paragraph, but it is not aircraft flight time under the 1.1 definition. A totals column that adds them to the aircraft column overstates aircraft time.

Signatures for simulator and training-device sessions

When an authorized instructor is present for device training counted toward instrument experience, the instructor must sign the person's logbook or training record to verify the time and content (www.ecfr.gov). For training time generally, 61.51(h) requires an entry endorsed legibly by the authorized instructor (www.law.cornell.edu) with a description of the training and the lesson length. These are signature duties in the trainee's record. Whether the instructor also keeps their own copy is a choice the rule does not impose, which is where a register's linkage field helps.

Worked calculation (Hypothetical Example)

Take a synthetic month of five sessions and two endorsements. Aircraft totals include only qualifying flight entries; ground and simulator sessions go in their own columns; endorsements carry no time.

- **F-001, flight, dual given:** 1.2 hours.
- **F-002, flight, dual given (solo-preparation flight before endorsement R-001):** 1.5 hours.
- **F-005, flight, dual given (practical-test preparation, linked to R-002):** 0.9 hours.
- **L-003, ground lesson:** 1.0 hour, recorded as ground instruction given.
- **D-001, simulator session:** 0.8 hours, recorded in a simulator column with its device identification.
- **Endorsements issued:** 2 (R-001 and R-002), time contribution 0.0.

Aircraft dual-given flight time is 1.2 + 1.5 + 0.9 = **3.6 hours**. The ground lesson (**1.0**) and simulator session (**0.8**) are tracked separately and do not move the 3.6, and the two endorsements add nothing to any time column. The control is mechanical: totals draw only from entries whose type is a flight in an aircraft. MyFlightbook's import documentation shows the same separation: its "CFI" field is hours of flight instructor time (myflightbook.com), while a "Ground Instruction Given" property records time providing instruction on the ground (myflightbook.com). ForeFlight's guide says Ground Training Given time is not included in its PDF logbook report (www.foreflight.com).

What Electronic Logbooks Document, and What They Do Not

Documented behavior by product

Table 3 below compares the instructor-side features each product's own pages describe, as described in the vendors' pages. These are vendor statements, not tests, and none is declared compliant. A feature a page does not mention is reported as not documented.

Product	Instructor-side endorsement list documented	Exports documented	Vendor statement about rules or acceptability
ForeFlight Logbook	An Endorsement Records list showing draft, pending, declined and accepted endorsements (www.foreflight.com), searchable by keyword, student name and date	Web CSV exports **exclude endorsements** (www.foreflight.com); the guide advises the Experience Report to save them. Whether any export lists endorsements issued to students is not stated in the pages reviewed	Support pages say the legality of logbook endorsements may vary by country (support.foreflight.com) and call the FAA electronic-signature AC non-regulatory (support.foreflight.com)
MyFlightbook	Instructors issue endorsements to linked students (myflightbook.com); a 2017 vendor post says instructors can view previously issued endorsements (myflightbookblog.blogspot.com); an "offline student" entry is recordkeeping within the CFI's account (myflightbook.com)	CSV download of the logbook (myflightbook.com); no export of issued endorsements is described in the pages reviewed	The design page says its approach has not been vetted by the FAA (myflightbook.com)
LogTen	Marketing says it tracks student endorsements and training milestones (logten.com); support pages describe more than 70 pre-loaded endorsements (support.logten.com)	A "Certificates" exporter is listed (support.logten.com), columns undocumented; the flights export **omits signatures** (support.logten.com) and is not a complete backup (support.logten.com)	Marketing says digital endorsements keep everything "organized and compliant" (logten.com); no regulation is cited
Garmin Pilot	A 2017 press release says CFIs can keep track of endorsements given to students (www.garmin.com); a product page mentions tracking training endorsements (www.garmin.com)	A 2016 post says the logbook stores endorsements and creates flight reports (www.garmin.com); current export documentation was not found	No compliance statement found; the sources cited are dated (2016-2017), so confirm current features with Garmin

Product	Instructor-side endorsement list documented	Exports documented	Vendor statement about rules or acceptability
Pilot Logbook (publisher's product, invitation-only)	Not advertised. No 61.189 register feature is claimed, and no endorsement linkage was tested for this report	Whole-logbook export and print layouts, per the publisher's description	No authority approval is claimed; a print layout is not an approval

Table 3 yields two patterns. First, endorsements are documented mainly as items signed for or shared with the student; only ForeFlight's guide describes a searchable list of issued endorsements, and no page reviewed says that a chosen export reproduces the four fields 61.189(b) requires, including a recorded test result. Second, two documented exports omit what an instructor needs to rebuild a register: ForeFlight's auto-export CSV excludes signatures and endorsements (support.foreflight.com), and LogTen's flights spreadsheet export omits signatures. ForeFlight's auto-export PDF (Complete Logbook - 2 Page) does include endorsements (support.foreflight.com), but no page reviewed shows that it reproduces the four 61.189(b) fields. An instructor relying on an app for the register should test a real export of a synthetic endorsement before relying on it and keep an independent copy.

Vendor claims need careful reading. ForeFlight's product page says instructors can maintain their own required training record (www.foreflight.com), which describes a purpose, not the field list of 61.189(b). MyFlightbook's design page states that a certificate number in its endorsements is "currently an unverified string of text" (myflightbook.com), a candid limit that applies to any app storing a certificate number as free text.

Electronic signatures and records in FAA guidance

The FAA's guidance on electronic signatures is AC 120-78B, which cancels AC 120-78A of 22 June 2016 (www.faa.gov). It says the FAA does not require use of electronic signatures or records (www.faa.gov), and that using them under Part 61 does not require formal FAA approval or acceptance (www.faa.gov). Among key elements it lists a signature that is permanent and tied to the information it signs. A 2008 FAA Chief Counsel letter states that the FAA does not define "logbook" and that a logbook may be computer-generated log sheets or any other record from which the FAA can decipher training and experience (www.faa.gov). That letter also said an instructor could meet 61.189(a) by signing a copy of a training record ledger when a student has no logbook. These are guidance and interpretation; no FAA statement was found certifying any logbook application.

Who keeps what: employers and schools

An employer's or school's records are not the instructor's personal record. The 2015 Chief Counsel reply says the Part 61 and Part 142 recordkeeping requirements "are separate" (www.faa.gov). For approved Part 141 pilot schools, 14 CFR 141.101 requires the school to maintain a current and accurate record of each student's participation (www.ecfr.gov), says a student's own logbook entries will not satisfy it, and sets school retention at at least **1 year** from graduation, termination or transfer (www.ecfr.gov). A school's retention period therefore says nothing about an individual instructor's 3-year floor, and an employer's internal policy should not be read as the FAA personal rule. Keeping a copy of a student's complete logbook is not a requirement of 61.189; the rule asks for the instructor's own record of endorsements and test outcomes.

Under 14 CFR 61.51(i), persons must present their logbook "or any other record required by this part" for inspection on reasonable request by the FAA, an authorized National Transportation Safety Board representative or a law enforcement officer (www.ecfr.gov). The text says "persons"; whether it reaches a 61.189 record is an interpretation, so the safe design assumption is that the register should be retrievable on request.

Retention, Export and Retrieval

The 3-year floor and the unresolved trigger

Paragraph (c) requires retention "for at least 3 years" (www.law.cornell.edu). The text does not state what event starts the period, and none of the official materials reviewed does either: the eCFR section, the official CFR editions, the 2008, 2010 and 2015 Chief Counsel letters, the Aviation Instructor's Handbook appendix, AC 61-65K and the ACS. Plausible readings include the endorsement date, the test date and the entry date, but each is an inference. A register should store the dates the rule mentions and let the instructor decide, with advice if needed, which review date to set.

Automated deletion is the wrong tool until that is settled, so the register in Table 2 leaves "retained-through review date" empty. AOPA commentary from 2006 notes the regulation does not require destruction after three years (www.aopa.org), so longer retention is the instructor's choice. Privacy is the counterweight: a longer-kept register holds other people's names and sometimes certificate data, so access limits and encrypted backup are sensible, but they are suggestions and not FAA requirements.

Backup and export

An AOPA attorney recommends saving a backup copy of digital records (pilot-protection-services.aopa.org), a recommendation and not a rule. Vendor documentation shows why. LogTen states, in capitals, that its flights export is not a complete backup (support.logten.com) and recommends periodically printing hard copies (support.logten.com). ForeFlight's guide says deleting an endorsement removes the record from the instructor's account but not the student's copy (www.foreflight.com), so one instructor action can erase the instructor's only retrievable trace. MyFlightbook says endorsements cannot be deleted by the issuer (myflightbook.com) and that correction means the student deletes the endorsement and the instructor issues a new one (myflightbook.com), making the student's action a dependency of the instructor's clean record.

Suggested register controls

The following controls are suggestions drawn from the gaps above, not FAA requirements:

- **Access limits.** The register holds other people's names, so restrict who can open it.
- **Encrypted backup.** Keep a second copy outside the logbook app, as the AOPA attorney's backup advice implies.
- **No automatic deletion.** Do not purge entries on a computed date until the start event for the 3 years is confirmed.
- **Verification status.** Record whether each row was checked against the original endorsement and when.

Changing schools or apps

A change of employer or software is where an app-only register fails. Four suggested checks reduce the risk:

- **Export test.** Issue a synthetic endorsement and one synthetic test row, export, and confirm that recipient, date, test kind and result appear.
- **Signature test.** Confirm whether signatures and endorsement text survive export, given that ForeFlight excludes endorsements from CSV and LogTen omits signatures from its flights export (support.logten.com).
- **Independent copy.** Keep the register as a spreadsheet or printed sheet outside the app, with scanned endorsement copies under access control.
- **Employer copies.** Treat an employer's copies as a convenience, since the instructor's record is personal.

Data Analysis and Evidence

The quantitative context comes from FAA statistics and rule parameters. No public data was found on how many instructors keep a separate endorsement register, so nothing here estimates compliance or search demand.

Population of instructors and students

The FAA counts an "active airman" as one holding both an airman certificate and a valid medical certificate. Under that definition, the FAA's 2025 Civil Airmen Statistics (Table 1, data as of 31 December 2025) show (www.faa.gov):

- **Flight instructor certificates: 145,538** in 2025 against **138,127** in 2024, a rise of 7,411 or about **5.4 percent**.
- **Active student pilots:** 370,286 in 2025 against 345,495 in 2024, a rise of 24,791 or about **7.2 percent**.
- **Total active pilots:** 887,519 in 2025 against 848,770 in 2024.
- **Students per instructor certificate:** about 2.5, computed from the two counts; the FAA notes the student series grows cumulatively because certificates issued since April 2016 do not expire.

The FAA's General Aviation survey adds a volume measure. Its CY2024 Table 1.4 puts instructional flying at about **8,143 thousand hours** in 2024 against about 8,256 thousand in 2023, a decline of about 1.4 percent, and active instructional aircraft at about 19.4 thousand against 19.9 thousand (www.faa.gov). Dividing hours by aircraft gives roughly **420 hours** per instructional aircraft, an average computed from those published values.

What the numbers imply

The counts show scale, not recordkeeping practice. The FAA does not publish how many instructors are current under 14 CFR 61.197, so the certificate count overstates those exercising privileges.

Rule parameters that shape a register

- **3 years:** minimum retention in 61.189(c) (www.govinfo.gov).

- **90 days:** training window before a student solo flight.
- **2 calendar months:** practical-test training window in 61.39.
- **5 applicants and 80 percent, within 24 calendar months:** one recent-experience route in 61.197.
- **1 year:** Part 141 school-record retention, a school duty.
- **8 hours:** limit on flight training in any 24-consecutive-hour period, a flight-time rule and not an endorsement rule.

Implications and Future Directions

For the working instructor

An hours column cannot reproduce who was endorsed, when, for which test, with what result. Instructors should decide deliberately where the 61.189(b) record lives and test that location the way they would test any backup, by retrieving a known item. Self-endorsement is no shortcut: 14 CFR 61.195 prohibits a flight instructor from making any self-endorsement for a certificate, rating, flight review, practical test or knowledge test required by Part 61 (www.ecfr.gov).

For app choice and Pilot Logbook

An electronic logbook is a good home for the aeronautical experience record: it totals, prints and exports. Whether it is also a good home for the endorsement register depends on testable behavior, specifically whether a real export contains **the four required fields**. Pilot Logbook, the publisher's own invitation-only product, is described by the publisher as the first kind of tool, with personal totals, editable columns and remarks, export and print layouts. It suits an instructor who wants the flight-time record in one place and will keep a separate register like Table 2. It does not suit one who needs an app to issue endorsements to students remotely or to act as the register itself, because no such feature is advertised. Any linkage of register rows to flights, for example a lesson ID in the remarks column, should be confirmed with the product first.

Open questions

- **Clock start.** If a Chief Counsel interpretation clarifies when the 3 years begin, the review date can be automated.
- **Results of pending tests.** How the "results" entry should be completed when an applicant does not report back remains unaddressed in official text.
- **Electronic acceptance.** FAA material reviewed treats electronic signatures as optional and not subject to formal approval, so acceptance in a given situation remains a question for the instructor and the FAA.
- **Guidance versions.** AC 61-65K replaced 61-65J in November 2025, yet AOPA's 2025 article still points to Appendix A of AC 61-65H (pilot-protection-services.aopa.org), showing how sample wording can lag the current AC.

Frequently Asked Questions (FAQs)

What must a CFI logbook endorsement record contain under FAA rules?

Under 14 CFR 61.189(b), the instructor's record must hold the name of each person whose logbook was endorsed for solo flight and the date (www.govinfo.gov), and for each knowledge-test or practical-test endorsement the name, the kind of test, the date and the results (www.law.cornell.edu).

What does 14 CFR 61.189 say about instructor records?

Three duties: sign the logbook of each person trained (www.law.cornell.edu), maintain the endorsement record in a logbook or separate document (www.law.cornell.edu), and retain the records for at least 3 years (www.law.cornell.edu).

How long must a CFI keep endorsement records?

At least 3 years (www.law.cornell.edu), a floor the Aviation Instructor's Handbook also states. The start event is not stated in the sources reviewed, so an instructor should not assume a deadline from a guessed reading.

How should a CFI log dual given as a flight instructor?

Dual given is a column in the experience record tied to flight entries in an aircraft, and LogTen defines it as time flown as an instructor (support.logten.com). Log ground instruction separately, as MyFlightbook does (myflightbook.com), and never add endorsements to time.

Is a dual given logbook entry enough as an endorsement record?

No. It records time. A solo or test endorsement needs the person's name and date in the instructor's own record and, for tests, the kind and result.

Can the endorsement record be electronic?

The rule permits "a logbook or a separate document" (www.law.cornell.edu), and AOPA commentary says paper, electronic or both are acceptable (pilot-protection-services.aopa.org). AC 120-78B says using electronic signatures and records under Part 61 does not require formal FAA approval.

What is a CFI student endorsement log template?

The register in Table 2 is one: recipient, category, date, test kind, result, evidence location, related lesson, source version, verification status and review date, of which only four come from the rule. AC 61-65K supplies sample wording, not a register template.

How can an electronic logbook help a flight instructor track endorsements?

ForeFlight describes an Endorsement Records list with states and search (www.foreflight.com), and **LogTen** describes pre-loaded endorsements (support.logten.com). Test whether an export reproduces the required fields, since ForeFlight's CSV export excludes endorsements and LogTen's flights spreadsheet export omits signatures.

Conclusion

A flight instructor's personal records serve two purposes that look alike and are not. The aeronautical experience record, governed by 14 CFR 61.51, totals time in aircraft and devices. The endorsement record, governed by 14 CFR 61.189(b), preserves who was endorsed for solo flight or a test, when, for which test kind and with what result, and must be kept for at least 3 years. An hours column and a student's signed logbook do not reproduce the second record, and AC 61-65K, which is voluntary and does not cite 61.189, does not change that.

The answer to the decision this report set out is conditional. An instructor's records can reproduce the required endorsements and outcomes if the register carries the four rule-required fields, keeps unresolved results visible, links each row to its evidence, and is exported and retrieved as a test before it is needed. The electronic logbooks documented here are stronger on flight time than on endorsements, and every vendor statement remains a vendor statement. The start of the retention period is unresolved, so the register leaves that date blank until the trigger is confirmed. This report explains records; it is not legal advice, operational guidance, or a substitute for the regulation, an examiner's decision or an operator's approved procedures.

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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