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How to Log PIC Time FAA: Sole Manipulator vs Acting PIC

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Executive Summary

Under United States rules, a pilot's printed PIC (pilot in command) column is an output, not a primitive. It can be reproduced only if each entry keeps its logging basis, crew role, qualifying interval and supporting record. The current text of 14 CFR 61.51(e) on the eCFR (Electronic Code of Federal Regulations), "up to date as of 10/29/2026" (www.ecfr.gov), lists distinct bases. A pilot may log PIC as sole manipulator of the controls of an aircraft for which the pilot is rated (www.ecfr.gov), or when acting as PIC of an aircraft for which more than one pilot is required (www.ecfr.gov). The sole-manipulator basis opens with an explicit exception for time logged under 61.159(c) (www.ecfr.gov), the Part 135 second-in-command (SIC) professional development program, whose time may not be logged as PIC "even when the pilot is the sole manipulator" (www.ecfr.gov).

Two pilots can therefore both log PIC for one flight without both being the designated commander. In the FAA Chief Counsel's Gebhart letter of 22 June 2009 (www.faa.gov), a flight of 2.2 hours includes 2.0 hours of simulated instrument flight (www.faa.gov). One pilot logs all 2.2 hours as sole manipulator; the pilot who acted as PIC and safety pilot logs the 2.0-hour portion. The 1999 Carpenter letter says two pilots cannot act as PIC at once but can log PIC at once. A later FAA letter says Carpenter's statement that an SIC can log PIC "is incorrect outside of" the supervised-duties paragraph (www.faa.gov), so Carpenter must not be reused beyond its stated facts.

Recipients do not share one definition. One carrier defines PIC as "Captain or Aircraft Commander of record" (careers.southwestair.com), another says PIC is "not simply the sole manipulator of the controls" (careers.fedex.com), a third asks for "PIC or SIC as defined in 14 CFR" (www.delta.com), and an insurer asks for "logged" PIC hours (www.aig.com). No universal airline definition was established.

The recommended method is a purpose-labelled evidence ledger kept beside the logbook. Record the basis once per interval, generate each requested subtotal by filtering on basis, and never add two pilots' PIC entries into aircraft total time. In the illustrative example below, one hypothetical logbook supports PIC figures of 9.2, 4.7, 5.0 or 7.0 hours depending on the definition requested, against 10.9 hours of aircraft time. This report explains United States record-keeping rules. It is not operating guidance and does not replace an examiner's, an authority's or an operator's decision.

Introduction and Background

Most guides stop at the distinction between logging and acting. Gleim says a pilot has to "understand the difference between acting as PIC and logging PIC time" (aviation.gleim.com), and KármánLogs says the two "are two different things in the FARs, and they do not always overlap" (www.karmanlogs.com). The Federal Aviation Regulations (FAR) are Title 14 of the Code of Federal Regulations. That distinction is well published. What a professional pilot often lacks is a way to show, months later and to a third party, which basis produced each PIC minute.

PIC totals travel between audiences. KármánLogs observes that "PIC totals drive insurance quotes, airline minimums, and certificate requirements" (www.karmanlogs.com). The regulation requires a pilot to "document and record" time used for a certificate, rating or flight review "in a manner acceptable to the Administrator" (www.ecfr.gov) and specifies entries for each flight, including the type of pilot experience. It does not prescribe a column layout or a field for the basis.

This report therefore treats the PIC column as the end of a chain: a flight, a crew arrangement, a controls interval, a regulatory paragraph, a duration and a source document. It covers the United States. Other authorities define PIC differently, and a Canadian or European logbook should be read against its own rules. Eligibility to serve as second in command, including the professional development program and required-SIC qualification, and the crediting of cross-country time are covered in separate articles on this site. They appear here only where they change the PIC column.

Method and limits: the current 61.51 text was read on the eCFR page dated 29 October 2026. FAA legal interpretation letters were read in full from the FAA document library, and each is treated as an answer to its stated facts. Vendor and guide statements are attributed to their publishers. Where a page gave no definition, this report says so rather than inferring one.

Which PIC Definition Does the Receiving Record Request?

The first decision is which question the recipient is asking. Four different questions share the label "PIC time".

- **Regulatory logging under 61.51(e).** Time the pilot may log as PIC for certificates, ratings or recent experience.
- **Command designation.** The regulatory definition of pilot in command requires final authority and responsibility for the flight (www.ecfr.gov) and designation as PIC before or during the flight (www.ecfr.gov).
- **Controls time.** Time as sole manipulator, which is one logging basis but not a command designation.
- **A recipient's own definition.** An employer, insurer or foreign authority may narrow or widen any of the above.

What published recipient wording looks like

Table 1 collects wording from recipients' own pages, read in November 2026. It is not a ranking. It shows the same label defined in at least three ways, with several pages giving no definition.

Recipient (own page)	What the page says about PIC	What it means for a ledger
Delta hiring FAQ and application guide	"Minimum of 250 hours PIC or SIC as defined in 14 CFR §61.159(a)(5) in an airplane category" (www.delta.com); the guide says to "include your instructor time with your PIC for each applicable aircraft" (www.delta.com).	Subtotal keyed to 61.159(a)(5), which counts PIC time and supervised SIC time performing PIC duties, not the 61.51(e) logging set; instructor time merged for the form. Keep both component entries.
Southwest pilots page	"PIC time is defined as Captain or Aircraft Commander of record" (careers.southwestair.com).	Command-designation subtotal. Sole-manipulator-only entries are a different set.
FedEx pilot page	PIC is "defined as Captain/Aircraft Commander of record," (careers.fedex.com), "not simply the sole manipulator of the controls." (careers.fedex.com); the requirement applies to specified aircraft types (careers.fedex.com).	Command designation plus an aircraft-type filter.
Horizon Air pilots page	"250 total hours of flight time as pilot in command including 100 hours" (careers.alaskaair.com); another track asks for "at least 200 hours of FAA-approved Prior Qualifying Time to serve as pilot in command" (careers.alaskaair.com).	Two PIC concepts on one page: logged hours and Part 121 qualifying time.
SkyWest posting; **United** first officer page	The posting uses a 250-hour PIC threshold (jobs.skywest.com); United's page states total time (careers.united.com). Neither retrieved page defined PIC.	No definition to reproduce. Ask, or state the basis used.
AIG pilot applications (insurer)	Requests "Total Logged Pilot-In-Command hours for all aircraft" (www.aig.com) and "Logged Pilot in Command Hours" (www.aig.com).	"Logged" suggests the regulatory subtotal, but neither form defines it.
ICAO Annex 1 (as reproduced in an ICAO working paper)	PIC is "The pilot designated by the operator, or in the case of general aviation," the owner (www.icao.int); a separate category covers a "Co-pilot performing, under the supervision of the pilot-in-" command (www.icao.int).	Designation-based, with a distinct supervised category.

Table 1 shows a spread rather than a convention. Two carriers tie PIC to the commander of record, one points to 14 CFR 61.159(a)(5), two give no definition, and the ICAO text is designation-based. Pages change, so each wording should be re-read when an application is prepared.

Consequences for the column

If the recipient's definition is "captain of record", sole-manipulator time as a first officer, however loggable under 61.51, is a different set from the one requested. If the recipient points to a specific paragraph, as Delta does with 14 CFR §61.159(a)(5), use the set that paragraph describes. For 61.159(a)(5) that is PIC time plus supervised SIC time performing PIC duties, not the full 61.51(e) logging set. If there is no definition, the defensible course is to supply the subtotal with a one-line statement of the basis. Nothing read for this report establishes a universal airline PIC definition.

Foreign records add another axis. The EU Part-FCL definition, as published in a UK legislation copy, describes PIC as "the pilot designated as being in command and charged with the safe conduct" (www.legislation.gov.uk). Swiss guidance on European logbooks says "A co-pilot may log as PIC flight time flown as PICUS when:" stated conditions are met (ffac.ch), and EASA's acceptable means of compliance (AMC) requires that PICUS (pilot in command under supervision) time be "countersigned by the PIC" (www.easa.europa.eu). That is European text for European licences and is not interchangeable with 14 CFR 61.51.

Key Logging Bases in 14 CFR 61.51 and the Evidence Each Needs

Current 61.51(e)(1) applies to sport, recreational, private, commercial and airline transport pilots and lists the bases below. Text is as displayed on the eCFR at 29 October 2026, which the page calls "authoritative but unofficial".

Sole manipulator of the controls, 61.51(e)(1)(i)

A pilot may log PIC "when the pilot is the sole manipulator of the controls of an aircraft for which the pilot is rated" (www.ecfr.gov). The FAA reads "rated" as holding the category, class and type ratings, if a type rating is required (www.faa.gov). This basis needs a controls interval, not a command designation. The ledger should hold the start and end of sole manipulation and who else held a control seat.

Sole occupant, 61.51(e)(1)(ii)

A pilot may log PIC when "the sole occupant in the aircraft" (www.ecfr.gov). The ledger should say "sole occupant" rather than "solo" so the basis survives a later filter, because solo time has its own narrower rule.

Acting PIC where more than one pilot is required, 61.51(e)(1)(iii)

A pilot may log PIC when acting as PIC of an aircraft for which more than one pilot is required "under the type certification of the aircraft or the regulations under which the flight is conducted" (www.ecfr.gov). This lets a designated commander log PIC without touching the controls. The qualifying interval is the period in which the second pilot is actually required. For simulated instrument flight, the safety pilot must hold at least a private pilot certificate with ratings appropriate to the aircraft (www.ecfr.gov). Gleim calls the safety pilot "the most common situation" for this clause (aviation.gleim.com), and notes that acting as PIC requires designation "as PIC for the flight" (aviation.gleim.com).

Supervised duties, ATP, instructor and program provisions

A pilot who "performs the duties of pilot in command while under the supervision of a qualified pilot in command" may log PIC if the paragraph's conditions, including an approved training program, are met (www.ecfr.gov). The ledger line needs the program reference and the supervisor's certification, because the basis is the program, not the seat. An airline transport pilot "If rated to act as pilot in command of the aircraft" may log all time while acting as PIC of an operation requiring an ATP certificate (www.ecfr.gov). A flight instructor may log PIC for all time "while serving as the authorized instructor" (www.ecfr.gov). The 2018

rulemaking added a paragraph that "now allows a commercial pilot or airline transport pilot to log all flight time" as the assigned PIC in an approved SIC professional development program operation (www.federalregister.gov).

The explicit exception: 61.159(c)

The sole-manipulator paragraph opens with an exception for time logged under 61.159(c) (www.ecfr.gov). The 2018 preamble states that "Section 61.51(e) is also revised to prohibit an SIC from logging PIC time" in that program (www.federalregister.gov), and the current 61.159(c) bars PIC logging "even when the pilot is the sole manipulator" (www.ecfr.gov). A ledger needs a program flag that overrides the sole-manipulator tag.

Mapping the bases to ledger fields

Table 2 condenses the bases into the role to record, the qualifying interval and the supporting record. The last column is a record-keeping suggestion by this report, not a regulatory requirement.

Logging basis (14 CFR 61.51, as of 29 Oct 2026)	Controls / crew role to record	Qualifying interval	Supporting record to keep (suggested)
(e)(1)(i) sole manipulator	Pilot alone on the controls; other pilot's role noted	Only minutes of sole manipulation in an aircraft the pilot is rated for	Interval start and end; ratings held; program flag for 61.159(c) time
(e)(1)(ii) sole occupant	No other occupant	Whole flight with no other occupant	Departure and arrival record
(e)(1)(iii) acting PIC, more than one pilot required (not available to sport or recreational certificate holders)	Designated commander in a multi-pilot-required flight	Period when the second pilot is required by type certificate or operating rule	Designation evidence; crew-requirement basis
(e)(1)(iv) supervised PIC duties	Pilot performing PIC duties under supervision	Time meeting the program conditions	Program reference; supervisor's logbook certification
(e)(2) ATP acting as PIC	Rated ATP acting as PIC of an ATP-required operation	All flight time while acting as PIC	Designation evidence; operation type
(e)(3) instructor	Authorized instructor on the flight	Instruction time	Student and lesson reference
(e)(4) student pilot	Sole occupant (or airship duties), with solo endorsement	Only while undergoing training for a pilot certificate or rating	Solo flight endorsement; training record
(e)(5) assigned PIC, Part 135 program	Assigned PIC of a program operation	All flight time in the operation	Operations specification reference

Table 2 makes one structural point. Only the first row turns on who holds the controls. The others turn on who is aboard, who is designated or which program applies. A single "PIC" column erases that difference, which is why the basis must travel with the entry.

Worked Two-Pilot Example: Elapsed Aircraft Time Versus Each Person's Loggable Interval

An FAA letter and its follow-ups answer the central question: how can two pilots record PIC on one flight without representing both as the designated aircraft commander?

The FAA's Gebhart example

In the Gebhart letter, Pilots A and B, both rated in the aircraft, fly between two airports. "As agreed to prior to the flight, Pilot A flies the aircraft and" Pilot B acts as PIC (www.faa.gov). Pilot A flies in simulated instrument flight with Pilot B as safety pilot. "The total flight time is 2.2 hours and the total simulated instrument time is 2.0" (www.faa.gov).

The answer: "Pilot A may log the entire flight (2.2 hours) of PIC flight time because that" pilot was the sole manipulator for the entire flight (www.faa.gov). Pilot B may log the "portion of the flight during which Pilot A operated in simulated instrument flight and Pilot B" acted as safety pilot, 2.0 hours, as a required flight crewmember (www.faa.gov). The letter cites 14 CFR 91.109(b). The simulated-instrument safety-pilot rule now appears in 91.109(c) (www.ecfr.gov), which the 2013 Creech letter also cites.

The two intervals rest on different bases. Pilot A's 2.2 hours rest on sole manipulation. Pilot B's 2.0 hours rest on acting as PIC while a second pilot was required. Only Pilot B was the agreed commander. The aircraft flew 2.2 hours; the two logbooks together show 4.2 hours of PIC. Those figures are never added to one aircraft record.

The follow-up letters

The 2013 Creech letter applies the same reasoning to a twin-engine aircraft certificated for single-pilot operation. Pilot A may log the entire flight as sole manipulator. "Assuming that Pilot Bis acting as PIC for the flight, Pilot B may log any portion of the" simulated-instrument interval (www.faa.gov). The converse: "if Pilot A is acting as PIC for the flight, then only Pilot A may log PIC time" (www.faa.gov), and the safety pilot logs SIC time. The letter adds that these logging rules apply regardless of whether the aircraft is multi-engine.

The Walker letter covers instrument conditions where only one pilot is required. Pilot A acts as the actual PIC, yet "may not log PIC time for the portion of the flight during which" Pilot B is the sole manipulator (www.faa.gov), because no second pilot was required. The letters agree: the answer depends on whether a second pilot is required for the interval logged.

Guides describe the same split. GlobalAir says the pilots may "prior to initiating the flight, agree that the safety pilot will be the PIC" (www.globalair.com) and that otherwise "The safety pilot may concurrently log as SIC time" (www.globalair.com). AOPA's archived 2006 guidance says the pilots "must agree that the safety pilot is the acting PIC" (www.aopa.org) and suggests both record the other pilot's name (www.aopa.org). Cross-country credit on this flight is a separate calculation, covered in the cross-country article.

An illustrative 132-minute reproduction (Hypothetical Example)

This reproduces the Gebhart figures in minutes. It is not a measured operating benchmark. It assumes both pilots rated, no third occupant, Pilot B agreed in advance to act as PIC, and the hood interval wholly within the flight.

- **Aircraft flight time:** 2.2 hours = 132 minutes.
- **Simulated-instrument interval:** 2.0 hours = 120 minutes.
- **Pilot A's PIC:** 132 minutes, basis 61.51(e)(1)(i), controls interval 132 minutes.
- **Pilot B's PIC:** 120 minutes, basis 61.51(e)(1)(iii), controls interval 0 minutes (assumed), designation by prior agreement.
- **Arithmetic:** 132 + 120 = 252 minutes of PIC across two logbooks for 132 minutes of aircraft time.

If the pilots had agreed that Pilot A was acting PIC, the Creech reasoning gives Pilot A 132 minutes of PIC and Pilot B 0 minutes of PIC with 120 minutes of SIC. One elapsed flight yields two different ledgers, which is why designation evidence is a required column.

Professional Multi-Crew Case: Controls Manipulated Versus Carrier Command Designation

A two-pilot airline crew is a stricter version of the same problem. The carrier designates a commander, either pilot may manipulate the controls, and the records must keep those facts apart.

What Carpenter says, and its stated assumptions

The Carpenter letter of 9 February 1999, signed by an attorney in an FAA regional counsel office, addresses a Part 121 operation in which "the air carrier has designated a pilot and a copilot as" required by 14 CFR 121.385(c) (www.faa.gov). The SIC is the sole manipulator of the controls and "has passed the competency checks required for Part 121" operations, at least as SIC (www.faa.gov). The reasoning has three parts:

- **Acting and logging differ.** "There is a distinction between acting as pilot in command and" logging it (www.faa.gov).
- **Two can log, one commands.** "While it is not possible for two pilots to act as PIC" at once, two can log PIC at once (www.faa.gov).
- **Designation follows the carrier.** The designated pilot remains PIC for the entire flight regardless of who manipulates the controls.

The letter also warns that an SIC who can log PIC "may not be qualified to serve as" PIC under Part 121 (www.faa.gov).

Status check: the 2012 Counsil correction

Carpenter cannot be reused as a general statement. A 2012 letter to Mr. Counsil added a footnote saying it "corrects the legal interpretation to Bill Carpenter issued on February 9, 1999 by the FAA" (www.faa.gov). The footnote says a pilot "can only log PIC time" for 61.51 purposes "if she holds the appropriate category, class,

and type ratings" (www.faa.gov). The main text adds that logging PIC as sole manipulator in the airplane concerned required a type rating "that was not subject to a" "SIC Privileges Only" limitation (www.faa.gov). The second route it identifies is the supervised-duties paragraph.

For a ledger, Carpenter becomes a conditional. Its conclusion holds for a first officer with the appropriate category, class and type ratings and an interval of sole manipulation. It does not carry over to an SIC holding only SIC privileges, and the Carpenter letter did not say which ratings the SIC held. No FAA page read for this report states that Gebhart, Creech or Walker were withdrawn. That is a finding about the pages read, not a guarantee of current status.

Rule changes since the older letters

The older letters quote earlier versions of 61.51(e). The eCFR page's cross-reference lists an October 2024 amendment titled "Removal of Expiration Date on a Flight Instructor Certificate" (www.federalregister.gov); the logging-basis paragraphs used here come from the eCFR text, not from that amendment. A separate October 2024 rule titled "Public Aircraft Logging of Flight Time" (www.federalregister.gov) is the document under which a government-designated SIC category was added to 61.51(f). Readers should check the eCFR on the day they prepare a record.

What the airline-side record still needs

A captain's entry has a designation, an ATP-based paragraph and, for some legs, a controls interval. A first officer's entry has a controls interval and a rating basis, while the carrier's records, not the logbook, hold the command designation. The ledger should keep the designation evidence the pilot lawfully holds, or say that none is held. It should not infer designation from the seat.

Implementation Considerations and Process Changes

Build the ledger beside the logbook

Table 3 shows a purpose-labelled ledger with four hypothetical rows built from the Gebhart reasoning and the rule text. They are not real entries. The ledger fields are: flight ID and date; authority and purpose; designated commander evidence; aircraft and rating facts; required-crew basis; sole-manipulator interval; claimed logging paragraph; claimed duration; source document; unresolved question; and destination form. Durations are in minutes.

Flight / date	Authority / purpose	Commander evidence	Aircraft / rating facts	Required-crew basis	Sole-manip. interval	Claimed paragraph	Claimed min.	Source document	Unresolved question	Destination form
F1 2026-03-04 (Hypothetical Example)	Certificate application; owner is Pilot A	Prior agreement that the other pilot is PIC	Both rated; 132 min elapsed	Hood interval 120 min	132	61.51(e)(1)(i)	132	Logbook page	None	Application tally

Flight / date	Authority / purpose	Commander evidence	Aircraft / rating facts	Required-crew basis	Sole-manip. interval	Claimed paragraph	Claimed min.	Source document	Unresolved question	Destination form
F2 2026-03-11 (Hypothetical Example)	Same purpose; owner is Pilot B	Prior agreement naming owner as PIC	Both rated; 132 min elapsed	Second pilot required in hood interval	0	61.51(e)(1)(iii)	120	Logbook page; other pilot's name	Does the recipient count agreed designation as "commander"?	Application tally; excluded if captain-of-record
F3 2026-04-02 (Hypothetical Example)	Part 121 trip; owner is designated captain	Carrier crew record held by pilot	ATP, type rated; 300 min elapsed	Two pilots required by operation	150	61.51(e)(2)	300	Carrier trip record	Export the controls interval?	All PIC forms
F4 2026-04-09 (Hypothetical Example)	Part 135 program flight; owner is SIC	PIC's logbook certification	Program SIC; 90 min elapsed	Second pilot not required	90	Not PIC; SIC under 61.159(c)	0 PIC; 90 SIC	Logbook certification	None	Excluded from PIC subtotals

Table 3 keeps the unresolved question in the row rather than a note. F2 is loggable but not self-evidently PIC for a recipient that defines PIC as command of record, so the table flags it rather than recoding it. F4 illustrates the carve-out: the pilot was sole manipulator for 90 minutes, yet 61.159(c) bars logging that time as PIC.

Bridge from the ledger to a requested subtotal

Using the four hypothetical rows, the bridge runs in five steps.

1. **Fix the requested definition.** Copy the recipient's wording into the ledger header, or record that none was given.
2. **Select rows by basis, not by column.** Under "any 61.51(e) basis", select F1, F2 and F3.
3. **Sum minutes within one pilot's logbook.** 132 + 120 + 300 = 552 minutes, or 9.2 hours.
4. **Produce alternate subtotals from the same rows.** Sole-manipulator only: 132 + 150 = 282 minutes (4.7 hours). Captain of record only: F3 = 300 minutes (5.0 hours), or 420 minutes (7.0 hours) if the recipient accepts F2's prior-agreement designation.
5. **Leave aircraft time alone.** Total flight time is 132 + 132 + 300 + 90 = 654 minutes (10.9 hours). No role tag is added to it.

One hypothetical logbook therefore supports four PIC figures. The figure supplied should always travel with the definition used.

Presentation tools: paper, established electronic logbooks and Pilot Logbook

None of the logbook tool pages read for this report documents a field for the regulatory logging basis, so the ledger stays a separate artifact, on paper or in a spreadsheet. *Table 4* compares what each tool's own pages describe for totals, export and printing, as read in November 2026. It is a feature description, not a ranking.

Tool (own pages)	Totals and filtering described	Export and printing described	Logging-basis field described?
Paper (ASA sample page)	Running rows such as "TOTAL TO DATE" (cdn11.bigcommerce.com)	The printed page itself	No. The basis lives on a separate sheet.
MyFlightbook	Says it "doesn't have fixed pre-defined categories of what get totaled" (myflightbook.com); totals "are then computed" on the filtered flights (myflightbookblog.blogspot.com); warns that filtering on PIC or SIC time itself distorts PIC and SIC totals (myflightbookblog.blogspot.com)	Printing in "14 different layouts" as of its 2022 post (myflightbookblog.blogspot.com)	Not on the pages read
ForeFlight Logbook	Auto-fill from total time, with options including PIC and SIC (foreflight.com); catch-up entries for bulk time "for each category (PIC, SIC, Night, Instrument, etc.)" (support.foreflight.com)	CSV export through its web version (support.foreflight.com)	Not on the pages read
LogTen Pro	Entry of a paper logbook's PIC total (support.logten.com); a Turbine PIC Smart Group (support.logten.com); role-based auto-fill of fields such as SIC (support.logten.com)	Part 61 requirement reports (support.logten.com)	Not on the pages read
Pilot Logbook (LANDING.AERO, this site's publisher; invitation only; vendor description, not independent evidence)	Custom totals and totals by type	Export of every field as a spreadsheet; printing with a chosen date range and columns; an editable signature	Not described on its page, which makes no claim of regulatory approval or validation. Request an invite.

Table 4 shows that each tool describes totals, export or printing in some form, and that none documents the basis behind a PIC minute. Auto-fill and catch-up entries save typing but do not record why a minute was PIC, so the ledger sits alongside any of them. With Pilot Logbook, its custom totals and field export would be the presentation layer for each subtotal the ledger has already decided. Pilot Logbook is published by this site's operator and access is by invitation only, so this row is a vendor description, not independent evidence.

Reconcile an export and flag unsupported entries

Export every field and tag each row with the ledger's basis. MyFlightbook's FAQ says "you can trust that the math done by MyFlightbook is correct" for the data entered (myflightbook.com). The same logic holds for any tool, because arithmetic cannot supply a missing basis. Next, list rows where PIC minutes exceed the controls interval and no other basis is recorded. Flag those rows as unsupported and ask the question the ledger's "unresolved question" column exists for. A flagged entry is honest; recoding a row to make a total fit is not.

Data Analysis and Evidence

Regulatory thresholds that make the PIC subtotal matter

Subtotals feed requirements with specific numbers. The ATP experience rule requires "at least 1,500 hours of total time as a pilot" (www.ecfr.gov). Within it, 250 hours must be flown "in an airplane as a pilot in command" (www.ecfr.gov), which may also be met with SIC time performing the duties of pilot in command. The FAA's 2022 rule on recognition of pilot-in-command experience in the military and air carrier operations added "additional crediting options for certain pilot in command (PIC) time" (www.federalregister.gov), so even the regulator credits PIC time differently by purpose.

These figures are not interchangeable PIC definitions. The 250-hour ATP block expressly allows supervised SIC time, while a carrier's captain-of-record minimum is not obviously the same set. The ICAO limitation wording in 61.51(f)(4)(ii), "Holder does not meet the pilot in command aeronautical experience requirements of ICAO," applies to an airline transport pilot applicant who logs government-designated second-in-command time in an aircraft not type certificated for two pilots. In that narrow case a US-certificate total and an ICAO-compatible total can differ (www.ecfr.gov).

What the evidence base shows and does not show

- **Interpretations read:** five FAA legal interpretation letters, dated 1999 to 2013, each bound to its stated facts. Several quote earlier 61.51(e) text, and one footnote corrects another.
- **Recipient wording:** among pages read, two defined PIC as captain of record, one referred to the CFR, and the rest gave no definition. This is a small convenience sample, not a market survey.
- **Guide consensus:** GlobalAir says "it is possible for two pilots to log PIC flight time simultaneously" (www.globalair.com), AOPA says "there can only be one acting PIC on a flight" (www.aopa.org), and KármánLogs calls dual PIC logging "normal and legal" (www.karmanlogs.com). Guide agreement is not independent confirmation; the rule text and FAA letters are the primary evidence.
- **Not available:** measured error rates for self-reported PIC totals, and any ranking or link data for this topic.

Implications and Future Directions

For the individual pilot, the shift is from "what is the PIC total?" to "which PIC total, defined how?". A ledger that records basis and interval turns the second question into a filter rather than a recomputation. KármánLogs' advice to "Decide before the flight and be consistent" (www.karmanlogs.com) points the same way for safety-pilot arrangements: decide the acting PIC in advance and record it, because the other pilot's loggable time follows from that choice.

Open uncertainties should be named in any record that relies on them.

- **Interpretation drift.** The older letters pre-date later rule changes. The eCFR is the source to re-read.
- **Recipient drift.** Employer pages change. Table 1 is a November 2026 snapshot.

- **Foreign recipients.** Under the EASA AMC, a licence holder may log as PIC "all of the flight time" while PIC (www.easa.europa.eu), with a supervision rule under which "both the pilot and the supervisor may log" PIC (www.easa.europa.eu), a different treatment of supervised time than 14 CFR 61.51. Swiss guidance restates the same base rule (ffac.ch).
- **Tool support.** Until a logbook tool documents a basis field, the ledger remains separate and manual.

KármánLogs describes its guide as educational and as summarizing the regulations "as of the date above" (www.karmanlogs.com), the right posture for any secondary source, including this report. Questions about a specific entry belong with the examiner, authority or recipient who will judge it.

Frequently Asked Questions (FAQs)

How is PIC time logged under 14 CFR 61.51?

Choose the paragraph that applies to each interval: sole manipulator, sole occupant, acting PIC where more than one pilot is required, supervised duties in an approved program, or an ATP, instructor or Part 135 program provision. Record the date, total flight time, locations, aircraft and type of pilot experience, as 14 CFR 61.51(b) requires. Table 2 and the sections above cover only the PIC logging bases.

Is sole-manipulator time the same as PIC time for an airline application?

No. Sole manipulation is one logging basis. A recipient may ask for a subset such as captain of record, as one carrier's page does when it says PIC is "not simply the sole manipulator of the controls" (careers.fedex.com), or may point to a specific regulation, as Delta's page does with 14 CFR §61.159(a)(5) (www.delta.com).

What is the difference between acting as PIC and logging PIC?

Acting as PIC is a command designation. Gleim says acting as PIC requires designation "as PIC for the flight" (aviation.gleim.com).

Can a safety pilot log PIC time?

If the safety pilot is the agreed acting PIC, the safety pilot may log PIC for the simulated-instrument interval; if the other pilot is acting PIC, the safety pilot logs SIC (see the Creech letter above). GlobalAir notes the pilots may agree before the flight (www.globalair.com). Gleim says a safety pilot not designated PIC may log SIC because that pilot is "still a required crewmember" (aviation.gleim.com). Agree on the acting PIC before the flight.

How is PIC logged in a multi-crew aircraft?

Separate the carrier's designation from the controls interval. A designated captain may log under the ATP provision. A first officer's sole-manipulator PIC depends on holding the appropriate ratings, not an SIC-privileges-only type rating, and program SIC time under 61.159(c) is not PIC.

Can both pilots log PIC for the same minutes?

Yes, on different bases. GlobalAir says "it is possible for two pilots to log PIC flight time simultaneously" (www.globalair.com), and in the Gebhart example 2.2 hours and 2.0 hours were logged for one 2.2-hour flight. Neither entry is added to aircraft total time.

What should a PIC total for an ATP or airline application contain?

It depends on the recipient's definition, as with the carrier that defines PIC as captain of record (careers.southwestair.com). If none is given, supply the regulatory subtotal with a one-line statement of the basis, and keep the ledger available.

Conclusion

A personal PIC total can be reproduced if the logging basis, the controls or crew role, the qualifying interval and the supporting record are kept with each entry. Current 14 CFR 61.51(e) contains several distinct bases and an explicit 61.159(c) exception to sole-manipulator logging. The FAA letters read here show how two pilots can each log PIC on one flight: one on sole manipulation, the other on acting as PIC in an interval where a second pilot is required, with only one designated commander. The Carpenter letter must be used only with its stated assumptions and with the later Counsil correction in view.

Recipients define PIC in at least three ways, so no single column answers every form. The ledger, the five-step bridge and the rule against summing two pilots' PIC into aircraft time give a pilot a subtotal they can explain. Paper, MyFlightbook, ForeFlight, LogTen Pro and this site's own invitation-only Pilot Logbook (a vendor product, not independent evidence) can present the result, but none of the documentation read here replaces the basis record. Before submitting any record, re-read the eCFR text and the recipient's current wording, and put questions about a specific entry to the examiner, authority or employer who will decide it.

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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