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Part 117 Flight Time Records Audit: Scope and Lookback

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Executive Summary

This report examines what a US airline pilot needs to retain, and to be able to explain, before a personal 14 CFR Part 117 flight-time subtotal can be called substantiated. It covers record completeness, scope and an evidence handoff. It does not decide whether anyone may accept or operate a flight. Current text of 14 CFR 117.23 sets two flight-time windows, 100 hours in any 672 consecutive hours and 1,000 hours in any 365 consecutive calendar day period (www.ecfr.gov). Both count all flying on behalf of any certificate holder or 91K Program Manager.

Two familiar numbers cannot stand alone. A lifetime "total time" column answers a licensing-experience question under 14 CFR 61.51, which asks for entries per flight. A calendar-month export is cut on a different boundary from a 672-hour window and may carry dates without full timestamps. Neither shows which flying was done on behalf of which certificate holder, which calendar basis was used, or whether earlier history exists at all. The rule's own text defines a calendar day using either Coordinated Universal Time (UTC) or local time, so the basis has to be recorded rather than assumed.

Scope matters before arithmetic does. Section 117.1 covers passenger operations under Part 121 and certain Part 91 operations on behalf of a Part 121 certificate holder (www.ecfr.gov). Part 135 flight-time rules are a different regime, for example a 1,400 hour calendar-year measure for one- or two-pilot crews. The FAA's November 2014 letter to ALPA addressed compensated flying outside any certificate-holder or 91K relationship, and it conditioned its answer on no connection between the two (www.faa.gov) (far117understanding.com). It is historical and fact-specific, and this report did not establish its current status. An uncertain relationship therefore stays unclassified.

The practical product is a ledger with a separate, reviewed inclusion column, a calendar-basis column, full instants, a correction history and an unknown-history flag, plus a checklist of what was and was not supplied. Tools document useful pieces: APDL describes lookback begin and end times and entry-level detail (docs.nc-software.com), and MyFlightbook documents UTC date-time fields (myflightbook.com). The FAA's 2012 preamble describes compliance as a joint obligation of pilots and carriers (www.federalregister.gov), and unknown history must stay unknown, not zero. Pilot Logbook is one of the tools discussed, and it is not a Part 117 calculator.

Introduction and Background

A pilot who flies for more than one employer, or who moves from one logbook tool to another, eventually meets the same question: can this subtotal be explained, line by line, from records that still exist? The question sounds like arithmetic but is mostly about evidence: a subtotal is only as explainable as the entries behind it, the decision about which entries belong, and the history available when it was produced.

This report is written for US airline pilots who are actually subject to 14 CFR Part 117, the flight and duty limitation and rest rule for Part 121 passenger operations. It treats the pilot's own record as the object of study. It does not calculate whether a pilot may accept or operate any assignment, and it offers no operating advice based on any subtotal. Operator procedures and the FAA decide those matters, and a legal reading of a specific fact pattern belongs with the FAA's interpretation process and qualified counsel, not a worksheet.

Two clarifications set the frame:

- **Where record duties sit:** Part 117 has no section on pilot flight-time records, and §117.21 covers reserve status, not records. Record-keeping duties sit in 14 CFR 121.683 for Part 121 certificate holders and 14 CFR 61.51 for pilot logbooks.
- **Three quantities kept apart:** licensing experience (what 61.51 lets a pilot log toward certificates and ratings), flight-time inclusion (what counts toward §117.23) and flight duty period (FDP), a different measure again.

The report is published by the maker of Pilot Logbook, an invitation-only electronic logbook, which is discussed in proportion alongside paper, spreadsheets and established tools. That relationship is disclosed so the reader can weigh the product comments accordingly. All cited facts rest on independent regulators, standards bodies and vendors' own documentation for their own products.

Key Distinctions in the Standard

Distinction 1: Scope comes before the count

Part 117 does not apply to every US pilot. Section 117.1(a) states that the part prescribes limitations and rest requirements for all flightcrew members and certificate holders conducting passenger operations under Part 121 (www.ecfr.gov). Paragraph (b) extends the part to operations directed by Part 121 certificate holders under Part 91, other than subpart K, if any segment is conducted as a domestic, flag or supplemental passenger operation. Other regimes have their own measures. For example, §135.267 sets, for one- or two-pilot crews, a limit of 500 hours in any calendar quarter and 1,400 hours in any calendar year (www.ecfr.gov). The consequence for records is simple. Before any total is built, the pilot should write down which regime each employer's flying falls under, and the source of that classification.

Distinction 2: What the cumulative windows contain

Section 117.23(a) says the limitations "include all flying by flightcrew members on behalf of any certificate holder or 91K Program Manager during the applicable periods" (www.ecfr.gov). The FAA's 2013 clarification applied this to flights that are not themselves under Part 117: a Part 91 flight flown for a certificate holder, such

as a ferry flight, still counts for purposes of the cumulative limitations (www.federalregister.gov). The 2012 preamble gave a fatigue rationale: the pilot does not accumulate less cumulative fatigue because the flying was for a different operator (www.federalregister.gov). It also stated that the cumulative limit does not include personal flying (www.federalregister.gov). The 2013 clarification calls these generally hard limits that can be extended only in certain circumstances (www.federalregister.gov).

The inclusion test is therefore about on whose behalf a flight was flown, not about how it is classified in a logbook. A logbook field such as "PIC" says nothing about it, which is why the reference ledger below keeps a reviewed inclusion column separate from the raw flight record. ALPA's guide likewise answers the personal-flying question with "No" (far117understanding.com).

Distinction 3: The 2014 letter is narrow and historical

In a letter to ALPA dated November 2014, the FAA Chief Counsel's office answered whether flying not done for a certificate holder or 91K Program Manager is excluded from the §117.23 cumulative total. The answer was yes, the time would not be counted (www.faa.gov), conditioned on there being no connection between a certificate holder or 91K Program Manager and the person or entity the flying was done for (far117understanding.com). The same letter keeps the §117.5 point alive: an affirmative statement of fitness for duty is still required before any flight segment (www.faa.gov), consistent with the text of §117.5(d).

The letter is fact-specific authority that needs a current-status check, not a general exclusion of instruction, ferrying or "side flying". The FAA's interpretation page says its database consists of legal interpretations issued from 1990 to the present, and that not every interpretation is available there (www.faa.gov). It also says the Chief Counsel now considers only requests that present a novel or legally significant issue (www.faa.gov). This report did not establish whether the 2014 letter has since been superseded. The record-keeping rule that follows is that a flight whose relationship to any certificate holder or 91K Program Manager is unknown is recorded as an unresolved item, not as included or excluded.

Distinction 4: Experience time, flight-time inclusion and FDP are three different things

Licensing experience is governed by 14 CFR 61.51. A pilot must document and record time in a manner acceptable to the Administrator (www.ecfr.gov), with entries for each flight that include total flight time. Whether time may be logged as pilot in command or second in command is a separate entitlement question under 61.51(e) and (f). PIC and SIC entitlement under 61.51(e) and (f) is outside this report's scope.

Flight-time inclusion for §117.23 is a different filter. Definitions in §117.3 apply alongside those in 14 CFR 1.1 (www.ecfr.gov), and the 2012 preamble records that the FAA declined to create a Part 117 specific flight-time definition because numerous other regulations are based on the existing definition (www.federalregister.gov). Section 1.1 defines flight time as pilot time that commences when an aircraft moves under its own power for the purpose of flight (www.ecfr.gov), ending when the aircraft comes to rest after landing (www.ecfr.gov). A 2016 Chief Counsel letter adds that flight time continues to accrue as long as the pilot is required to remain onboard (www.faa.gov). How OUT and IN entries relate to that definition is a separate measurement question that this report does not address. This report requires only that the original duration and its unit be preserved.

FDP is a separate quantity again. Section 117.3 defines it as a period that begins when a flightcrew member is required to report for duty (www.ecfr.gov), and §117.23(c) sets FDP windows such as 60 hours in any 168 consecutive hours (www.ecfr.gov). FDP cannot be inferred from logbook block hours. The FAA's flight statistics show how many "durations" one flight can have: its ASPM system describes OOOI data as the times of actual aircraft movements, gate out, wheels off, wheels on and gate in (aspmhelp.faa.gov), and defines block time as the difference between Actual Gate In and Actual Gate Out (aspmhelp.faa.gov), and airborne time as the difference between Actual Wheels On and Actual Wheels Off (aspmhelp.faa.gov). The preamble also records that the FAA retained both cumulative FDP limits and cumulative flight-time limits (www.federalregister.gov). The ASPM definitions are statistical, not logging rules, but they show why a duration column without a stated basis is ambiguous.

Distinction 5: The windows, and the calendar basis

The two flight-time windows use different units. The 672-hour window is an elapsed-time measure: 672 hours is exactly 28 days of 24 hours. The 2012 preamble explains that the FAA chose consecutive hours as an unchanging uniform standard (www.federalregister.gov). The annual window is stated in calendar days, and the preamble says the FAA retained it as an expression of calendar days (www.federalregister.gov). Section 117.3 defines a calendar day as a 24-hour period from 0000 through 2359 using Coordinated Universal Time or local time (www.ecfr.gov).

That definition has a direct recording consequence, because it allows either UTC or local time. Local days are not always 24 hours long. NIST states that when daylight saving time starts, there is one less hour in that day (www.nist.gov), and when it ends, an hour is repeated and there is an extra hour in that day (www.nist.gov). UTC, by contrast, is not adjusted during daylight saving time (www.nist.gov), and local zones are expressed as offsets from it (www.nist.gov). The annual measure is therefore not a fixed 8,760-hour calculation. In UTC days, 365 days is 8,760 elapsed hours (an arithmetic fact), while a local-day window that spans only one clock change contains 8,759 or 8,761. The documented basis, UTC or local, has to be kept next to every subtotal. Which basis a particular carrier or pilot must use depends on the approved context and is not decided here.

The 2012 preamble noted that modern scheduling programs and spreadsheets can easily keep track of time periods (www.federalregister.gov). That statement concerns capability and prescribes no method for a personal record.

Distinction 6: Who keeps which record, and for how long

The rule text assigns the cumulative limit to both parties: no certificate holder may schedule and no flightcrew member may accept an assignment that would exceed the figures (www.ecfr.gov). The preamble calls compliance a joint obligation that applies to flightcrew members and carriers (www.federalregister.gov), and FAA Advisory Circular 117-3 repeats that Part 117 places a joint responsibility on the certificate holder and each flightcrew member (www.faa.gov). The FAA expects flightcrew members to inform their employing air carriers of flying that affects the limits (www.federalregister.gov), because without flightcrew member assistance, air carriers may not even know about some of the flying (www.federalregister.gov). ALPA's guide states that the flightcrew member has an obligation to report (far117understanding.com) and calls monitoring a joint responsibility (far117understanding.com).

The record-keeping text is split across several sections, none of them in Part 117 itself:

- **Pilot logbook (14 CFR 61.51):** the pilot must present the logbook for inspection on reasonable request (www.ecfr.gov). Section 61.51 states no retention period.
- **Part 121 operator records (14 CFR 121.683):** the certificate holder must maintain current records of each crewmember (www.ecfr.gov), including flight, duty and rest time records. The only period the section states is at least six months, for records of release from employment or disqualification (www.ecfr.gov).
- **Part 135 individual pilot record (14 CFR 135.63):** the certificate holder keeps an individual record of each pilot containing flight time in sufficient detail to determine compliance with the flight time limitations (www.ecfr.gov), retained for at least 12 months (www.ecfr.gov).

Two inferences follow, both editorial. No source opened states a regulatory "audit lookback" for a pilot's personal logbook. And because the annual window is 365 calendar days, explaining a subtotal as of one date needs the preceding year, and explaining one as of a date a year ago needs the year before that. The retention need is set by the question the record must answer.

Implementation Considerations: The Evidence Ledger and Handoff

Step 1: Confirm context and purpose

Write one line stating why the record is being built (reconciling two employers' records, or preparing an export before changing tools) and which operations fall under §117.1. If the purpose is to decide whether to accept an assignment, the worksheet is the wrong instrument.

Step 2: Separate the three classifications

Table 1 below separates the three quantities that are most often merged in a single "total" column.

Quantity	What it answers	Where the authority sits	What the logbook field alone cannot show
Licensing experience (personal total)	What time the pilot may log toward certificates, ratings and experience	14 CFR 61.51 documentation and entry rules, PIC and SIC entitlement under 61.51(e) and (f)	Whether the flight was on behalf of a certificate holder or 91K Program Manager
Flight-time inclusion (Part 117 subset)	Which flying belongs in a cumulative window	§117.23(a) "on behalf of" language; 14 CFR 1.1 flight time	The reviewed inclusion decision and its evidence
Flight duty period (FDP)	A duty measure that begins at required report	§117.3 and §117.23(c)	Report time, which is not in a block-time column

Table 1 shows that the three quantities have different authorities and different evidence. A personal total can be larger than the included subset or equal to it, and FDP cannot be recovered from either. A column labelled "total time" is silent on all three questions at once.

Step 3: Collect source flights and who they were for

For each flight, preserve the evidence of whose behalf it was flown on: a roster entry, a trip sheet, a dispatch release, an operational flight plan or a charter confirmation. The aim is not to prove a legal conclusion but to let a later reviewer see what the pilot knew when classifying the flight. Pilots with more than one employer should collect each employer's record separately, because the FAA's expectation that pilots inform their employing carriers of other flying (www.federalregister.gov) presupposes that the pilot holds those records.

Step 4: Identify the anchor and the calendar basis

A window is meaningless without its anchor, the instant or date from which it looks back. The rule text ties the limits to whether total flight time "will exceed" the figure at assignment. This report does not say what the assignment-specific anchor is in any approved context. It says to record the anchor that was actually used, with the UTC or local calendar basis. The same discipline applies to full timestamps: RFC 3339 notes that the UTC equivalent of a local clock reading may depend on administrative decisions about daylight saving time (www.rfc-editor.org), and warns that an unqualified local time fails to be interpretable across most of the globe (www.rfc-editor.org). Storing UTC instants avoids the ambiguity, and ISO describes its date-time standard as meant to be understandable to both people and machines (www.iso.org).

Step 5: Reconcile boundary flights, missing ranges and corrections

Boundary flights are those that straddle the start of a window. An elapsed-time window can cut through the middle of a flight. APDL's documentation illustrates one tool's treatment: its report marks a trip as "Normal" if the entire duration of the trip was included (docs.nc-software.com), with a partial alternative for trips cut by the boundary. How a particular approved context clips a flight is a regulatory-method question this report does not answer. The record's job is to hold the full OUT and IN instants so that any method can be re-run.

Corrections need a version trail: a changed OUT time, a flight moved between employers or a re-classified flight should create a new row version, not overwrite the old one. The FAA's electronic-records advisory circular, AC 120-78B, which covers pilot logbooks among other records, says an electronic record should provide equivalent or better data integrity, accuracy and accessibility than paper (www.faa.gov). It also says such systems should prevent data corruption (www.faa.gov), and that Part 61 and Part 91 users need no formal FAA approval, acceptance or authorization for them (www.faa.gov).

Step 6: Produce a reproducible subtotal and an unresolved register

The end product has two parts: a subtotal that someone else can recompute from the rows, and a register of everything that could not be classified or located. The register tells a reviewer what the subtotal does not claim.

The reference ledger

Table 2 below lists the fields of a personal ledger designed for this purpose. It is a reference asset for a spreadsheet or an export, not a feature of any product.

Field	Content	Why it is separate
Source or flight ID	Stable identifier from the roster, logbook or employer record	Lets a correction point at the row it replaces
Employer or on-behalf-of evidence	Name of the certificate holder or manager, plus the document that shows it	The inclusion test turns on whose behalf the flight was
Full actual OUT and IN	Date and time of both events, with UTC or an explicit offset	A date alone cannot place a flight in a 672-hour window
Original duration and unit	The figure as first recorded (decimal hours or hours and minutes)	Rounding and unit conversion are where reconciliations drift
Personal experience classification	PIC, SIC, other, per 61.51	Licensing entitlement is not inclusion
Reviewed Part 117 inclusion basis	Included, excluded or unresolved, with the reason and reviewer date	Keeps the reviewed decision apart from the raw record
Calendar basis	UTC or local, as documented for this record	A 365 calendar day window depends on it
Lookback start and end	The instants or dates the subtotal used	Makes the window itself auditable
Eligible duration	The portion counted inside the window	Allows boundary flights to be shown as partial
Correction or source version	Version number, date, and what changed	Prevents silent overwrites
Unknown-history flag	Set when earlier ranges or other-employer records were not supplied	Unknown must not be recorded as zero

Two people looking at the same raw flight can reach different inclusion decisions, so the record should show which decision the subtotal rests on. The eligible-duration column exists because a boundary flight contributes only part of its recorded time if the chosen method clips at all. None of the columns is a limit check, and a populated ledger does not show that any operation is permitted.

The completeness checklist

A second instrument asks whether the inputs were complete, with each item answered yes, no or unknown:

- **Employers:** Were records supplied for every certificate holder or 91K Program Manager the pilot flew for in the window?
- **Date coverage:** Does the record cover the full span the subtotal needs, including the 365 calendar day span and the boundary day?
- **Imports:** Were older flights imported, or does the tool start at its first entry?
- **Time fields:** Do the entries carry full OUT and IN instants, or dates and durations only?
- **Calendar basis:** Is the UTC or local basis recorded for each subtotal?
- **Corrections:** Does a version trail show changes since the subtotal was first produced?
- **Unclassified flights:** Is every flight of uncertain relationship to a certificate holder in the unresolved register?

A "no" or "unknown" answer does not stop the work. It changes how the subtotal is described: as a subtotal from the supplied records, with named gaps.

Existing Tools and What Their Documentation Establishes

Several established electronic logbooks document features that supply raw material for a personal review. The statements below describe only what each vendor's own pages say. Several of those pages are dated (the APDL documentation page and the MyFlightbook blog post are from 2018, and the APDL forum thread is from January 2015), so read them as historical documentation of the feature set, not as a current product test. No independent validation of any app was found.

- **APDL** documents a Legality Report that displays every entry included in each calculation yielding the cumulative limit totals (docs.nc-software.com), gives the exact begin and end date and time of the lookback range (docs.nc-software.com), and clearly indicates the beginning and end of the lookback period. Flights on the 100/672 detail page are listed with their Out and In times. The vendor also states that the report is only accurate as of the time it was generated (docs.nc-software.com). The page was last modified in 2018, so this is documented behaviour and not a current product test.
- **APDL forum (January 2015):** A vendor answer addresses missing history. It states that without the historical lookback, the software cannot evaluate the cumulative limit (forums.nc-software.com), and that the legality view will dim out the 1000/365 number (forums.nc-software.com). It also recommends importing history in smaller chunks so that accuracy is easier to verify (forums.nc-software.com). This is the clearest published example found of a vendor representing unknown history as unknown, the behaviour the unknown-history flag generalises.
- **MyFlightbook** documents Part 117 status as a currency display, with a figure for flight hours in the preceding 672 against the limit of 100 (myflightbookblog.blogspot.com). It documents a conservative default: when duty data is missing, it blocks off the entire 24 hour period containing that flight as FDP (myflightbookblog.blogspot.com). It states that it does not currently track 117.25(c), (d) and (e) (myflightbookblog.blogspot.com), and its currency notes leave the compliance decision to the pilot (myflightbook.com). Its import schema carries block-out and block-in as full UTC date-times (myflightbook.com).
- **ForeFlight** documents CSV export of logbook data through ForeFlight on the Web (support.foreflight.com). In its logbook template, the flight date is a separate YYYY-MM-DD field (support.foreflight.com) and the out-time is a time field for when the aircraft starts moving from the gate or ramp (support.foreflight.com). The template is an import specification, so whether an export has the same layout was not verified.
- **LogTen Pro** documents limit groups for 100 hours of total flight time in any consecutive 672 rolling hours (support.logten.com) and 1000 flight hours in any 365 rolling day period (support.logten.com). Its flight export can use every field available in LogTen (support.logten.com), while its spreadsheet export is documented as not a complete backup (intercom.help) and as excluding signatures and images (intercom.help).

- **Safelog** documents analysis tools for professional pilots flying under 14 CFR Part 117 (www.dauntless-soft.com) and a date-range filter for totals (dauntless-soft.com). **ALPA** documents a calculator that determines cumulative FDP hours, cumulative flight time hours and remaining hours (alpamobile-docs.alpa.org).

Table 3 places these tools, a spreadsheet, a paper logbook and Pilot Logbook side by side on the dimension that matters here: what the vendor's own pages establish about period totals and timestamps.

Option	Documented period or window features (APDL and MyFlightbook rows rest on 2015-2018 pages)	Documented time fields and export	What the pages opened do not establish
APDL	Lookback begin and end shown; entry-level detail	Out and In times listed	Current behaviour; employer-of-record classification
MyFlightbook	672-hour and 365-day currency display (myflightbookblog.blogspot.com)	UTC date-time block-out and block-in in its import schema	Whether its export mirrors the import schema; inclusion basis per flight
ForeFlight	Logbook date search is documented (foreflight.com)	Separate date and time-of-day fields in the template (support.foreflight.com)	Part 117 window tracking; date-range export
LogTen Pro	672 rolling hour and 365 rolling day limit groups (support.logten.com)	Export of every field; not a complete backup (support.logten.com) (intercom.help)	Column headers; whether Out and In export as full instants
Safelog	Date-range filter; Part 117 analysis tools (dauntless-soft.com) (www.dauntless-soft.com)	Not established in the pages opened	Custom-range export of Part 117 reports
Spreadsheet	Whatever the pilot builds	Whatever the pilot enters	Anything not entered; there is no built-in history check
Paper logbook	Totals as the pilot ruled them	Handwritten times	Re-computation on another boundary without re-entering every row
Pilot Logbook (invitation-only; request an invite)	Period totals; not built for Part 117 window tracking	Spreadsheet export and OUT and IN entry (publisher's own description, not independently verified)	Not a Part 117 calculator; no US limit validation; an exported total does not establish compliance

Table 3 supports a narrow conclusion. Every tool above can supply raw rows, and several document the boundary and history behaviour a reviewer would want. None of the pages opened documents what the ledger adds: a reviewed, per-flight record of whose behalf the flying was on. That judgement, and the decision about unknown history, stays with the pilot whichever tool holds the rows. The Pilot Logbook row is the publisher's own position, drawn from its product page and not cited as evidence.

Data Analysis and Evidence

The regulatory figures below come from the rule text. The worked examples are hypothetical teaching inputs, not benchmarks or real pilot records.

The regulatory quantities

- **Flight-time windows:** 100 hours in any 672 consecutive hours (www.ecfr.gov) and 1,000 hours in any 365 consecutive calendar day period (www.ecfr.gov).
- **FDP windows (different measure):** 60 hours in any 168 consecutive hours.
- **Elapsed-hour arithmetic:** 672 hours is 28 days of 24 hours. In UTC days, 365 days is 8,760 hours. These are arithmetic consequences, not rule text, and the second is not a substitute for the calendar-day basis.
- **Retention figures that exist in text:** six months for Part 121 release or disqualification records and 12 months for Part 135 individual pilot records, as set out above. No retention figure for a personal logbook appears in 14 CFR 61.51 as opened.

Worked example A (Hypothetical Example): a boundary flight

At an illustrative anchor of 2 November 2026, 12:00Z, a window of 672 elapsed hours begins 28 days earlier, at 5 October 2026, 12:00Z. Suppose a source flight runs from 11:30Z to 12:30Z on 5 October. Its recorded duration is 60 minutes. Under a purely geometric reading of that interval, only the 30 minutes after 12:00Z fall inside it. The example shows why full instants and boundary evidence must be preserved. It does not establish the assignment-specific legal anchor for any context, and it does not approve any clipping algorithm. Anyone who needs to label a result a Part 117 total must first verify the actual regulatory computation and carrier context and obtain independent legal and method review.

Item	Instant or value	Note
Illustrative anchor	2 November 2026, 12:00Z	Invented teaching input
672 elapsed hours earlier	5 October 2026, 12:00Z	28 days of 24 hours
Source flight	11:30Z to 12:30Z on 5 October	60 recorded minutes
Minutes inside the geometric interval	30	Illustrates preservation of instants only
Minutes outside	30	Not a statement about legal treatment

A record holding only a date and a 60 minute duration lets a reviewer reproduce neither the 30 nor any other treatment. A record holding both instants lets any method be re-run.

Worked example B (Hypothetical Example): scope and the unresolved item

Suppose three reviewed flights in a personal ledger:

- **Flight 1:** 120 minutes, reviewed as included.
- **Flight 2:** 195 minutes, reviewed as included.

- **Flight 3:** 60 minutes, independently classified as an unrelated personal flight.

The personal experience total is 120 + 195 + 60 = 375 minutes (6:15). The included subset is 120 + 195 = 315 minutes (5:15). The ledger shows why the figures differ by 60 minutes.

Now suppose the relationship of Flight 3 to any certificate holder or 91K Program Manager is not known. The ledger should then show an unresolved 60 minute item, with the included subset stated as 315 minutes from the flights reviewed so far, plus 60 minutes unresolved. It should not show an eligibility conclusion either way. This is consistent with the November 2014 letter's own conditioning on the absence of a connection (far117understanding.com).

Worked example C (Hypothetical Example): unknown history

Suppose an app imported only flights from 1 January 2026, and a subtotal is explained as of 2 November 2026. The 672-hour window lies inside the imported range, but a 365 calendar day window reaches back to early November 2025, so about two months of it have no entries. The correct statement is "subtotal from supplied records, history before 1 January 2026 unknown", with the unknown-history flag set. A number that treats the missing months as zero is incorrect. The 2015 APDL answer shows a vendor treating the same situation as not evaluable (forums.nc-software.com).

Implications and Future Directions

For individual pilots, "what is my Part 117 number" is better asked as "what rows, classifications and history does this number rest on". A tool can supply the rows. The classifications and history need a human decision recorded where someone else can inspect it. The FAA's preamble framed cumulative compliance as shared between pilot and carrier, and the ALPA guide advises that the flightcrew member should look back before each flight (far117understanding.com). A personal ledger can hold up the pilot's half of that obligation without replacing the operator's records or approved procedures.

For tool changes, the implication concerns exports. Before changing tools, a pilot can ask whether OUT and IN carry full date-times or only times of day, and whether signatures and attachments are included. LogTen documents that its spreadsheet export is not a complete backup, which is worth knowing before a migration.

Open items this report could not close:

- **Current status of the 2014 letter:** the FAA interpretation page warns that not every interpretation is available in its database (www.faa.gov).
- **Assignment-specific anchor and clipping method:** no FAA source opened states how a boundary flight is treated. The November 2013 look-back letter addressed only transition: Part 117 was not retroactive (www.faa.gov), and for early adopters the look-back reached back to the date they began operating under Part 117 (www.faa.gov).
- **Independent validation of tools:** none was found.
- **Practitioner practice:** an older r/flying discussion asking how others track flight time and FDP (www.reddit.com) is anecdotal and is not a legal source.

A maintained scope-and-history checklist linked to primary authorities might be useful to pilot associations, instructors and logbook support teams. No measured evidence supports that; it is a hypothesis.

Frequently Asked Questions (FAQs)

What are the Part 117 record-keeping requirements for a pilot's own flight time?

Part 117 as opened has no section on pilot flight-time records, and §117.21 is "Reserve status". Record duties sit in 14 CFR 61.51 for the logbook, 14 CFR 121.683 for Part 121 certificate holders and 14 CFR 135.63 for Part 135.

How long must flight time records be retained?

The sources opened state few figures: none in §61.51, six months for Part 121 release or disqualification records and 12 months for Part 135 individual pilot records. None of these figures is a retention rule for a pilot's personal logbook: the six-month and 12-month periods are employer-record provisions. As an editorial inference, not a rule, a personal record that must reproduce a 365 calendar day subtotal needs at least 365 calendar days of entries plus the boundary.

What is the Part 117 lookback period, and how far back does the FAA audit a logbook?

The rule uses two windows, 672 consecutive hours and 365 consecutive calendar days. The FAA's 2013 "look back" letter concerned the start of the rule (www.faa.gov). No source opened states an audit lookback: §61.51(i) is a duty to present the logbook on reasonable request, and an FAA FAQ confirms the NTSB element (www.faa.gov).

Does a personal record count flying for other employers?

Section 117.23(a) includes all flying on behalf of any certificate holder or 91K Program Manager, and the FAA expects pilots to inform their employing carriers of it. Flying with no such connection was treated differently in the November 2014 letter, which needs a current-status check.

Can an electronic logbook alone show compliance?

No tool page opened says so, and MyFlightbook's notes leave the decision to the pilot (myflightbook.com). An electronic record can be acceptable as a record (www.faa.gov), which concerns the record system and not a legal conclusion.

Why can a monthly export or a total-time column not substantiate a subtotal?

A monthly export is cut at month boundaries, while a 672-hour window is anchored at an instant and moves. A lifetime total is a licensing-experience figure under 61.51 with no on-behalf-of evidence, calendar basis or history flag.

Conclusion

A personal Part 117 flight-time subtotal can be explained from retained entries only if four things travel with it: the full instants of each flight, the reviewed decision about whether each flight belongs in the window, the documented calendar basis, and a flag for any history that was not supplied. Without those, a lifetime total or a calendar-month export is a different figure answering a different question.

The rule text is compact: 100 hours in any 672 consecutive hours, 1,000 hours in any 365 consecutive calendar day period, and all flying on behalf of any certificate holder or 91K Program Manager. The record needed to show that a number was built from the right flying is not. Scope comes from §117.1, inclusion from §117.23 and the cited FAA material, experience from 61.51, and FDP from its own definitions. Uncertain relationships stay unresolved.

Tools document useful parts of this, including lookback detail, UTC fields and exports, and none of the documentation opened here is an independent validation. Pilot Logbook, the publisher's own product, which is available by invitation (request an invite on the publisher's product page), can hold raw flights, period totals and an export for this kind of review. It is not a Part 117 calculator, and an exported total does not establish compliance. The decision about whether an operation is permitted remains with the pilot's operator procedures and the FAA, and a legal reading of a specific situation should come from the FAA's interpretation process or qualified counsel.

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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