

Commercial Aeronautical Time

1. For Comm SE: The 10hr solo aeronautical experience under 61.129(a)(4) MUST be solo, or if an instructor is along CANNOT be marked as dual. If an instructor is along, the instructor CANNOT give any training or advice while along (simulated SOLO often called PDPIC time). In addition, if you decide to try to use an instruction ride along (PDPIC) to satisfy the 10hr SOLO time, you should verify with the DPE prior to the check ride to prevent an issue. See below for further guidance on the commercial experience reqts.

- a. ***Can I combine the day and night dual cross-country requirements with the requirement for the 300 nautical mile cross country?***

No. The cross country flights are **required training (dual)** and the 300 nautical mile cross-country must be conducted as a **solo operation** or **while performing the duties of pilot-in-command** (sometimes called PDPIC time).

- b. ***I did a long cross-country flight to meet commercial certificate aeronautical experience requirements, but a non-pilot was on board. Since they aren't a pilot, I can log that flight as solo, right?***

No. 14 CFR [61.51](#) defines solo (except for airships requiring 2 crew members) as when **you are the solo occupant of the aircraft**. Do not confuse "sole manipulator of the controls" with "sole occupant."

- c. ***When can I log PDPIC time?***

PDPIC (performing the duties of pilot and command) time can be used in lieu of the solo aeronautical experience requirements for the commercial certificate, [14 CFR 61.129\(a\)\(4\)](#).

To log PDPIC time in an aircraft for which you do not hold a certificate for category, class, and type (if a type rating is required), you first receive the required training from an authorized instructor who then determines that you are ready to perform the duties of pilot in command.

When you perform the duties of pilot-in-command, your instructor is on board the aircraft, you are not the sole occupant, so do not log solo time. You log the time as pilot-in-command, not dual instruction. Your instructor also logs the time as PIC.

- d. ***Can I combine PDPIC and solo time to meet the commercial certificate requirements?***

No, [14 CFR 61.129\(a\)\(4\)](#) specifies PDPIC or solo. When different types of pilot time may be combined, the regulations will include the phrase "or any combination thereof."

- e. ***Does PDPIC time count toward total PIC time?***

It depends.

You may log both PDPIC time and PIC time when you hold a certificate for category, class, and type (if a type rating is required) for the aircraft flown.

If you are applying for an initial commercial pilot AMEL certificate and you do not already hold a multiengine rating, you may not log time in a multiengine aircraft as PIC. In this case, PDPIC time may only be used to meet the aeronautical experience requirements for a commercial certificate and a recommended practice is to log that time in a separate column in your logbook.