



July 29, 2020
Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor Room W12-140
Washington DC 20590

Re: Petition for Extension of Exemption 17942

This petition follows the requirements for inclusion in such documents set forth in the order presented in 14 CFR Part 11.81 (Petition for Exemption).

Petitioner Name and Mailing Address

Mr. Brandon J Hildreth
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Specific Section or Sections of 14 CFR from which Exemption is Sought

[14 CFR 61.51 (f) (2)]

To allow AirNet II, LLC (AirNet) to assign a properly trained and qualified second in command (SIC) during a flight that otherwise does not require a SIC and to also allow the SIC to log that flight time. 14 CFR 61.51 (f) (2) states:

"A person may log second-in-command time only for that flight time during which that person ... holds the appropriate category, class, and instrument rating (if an instrument rating is required for the flight) for the aircraft being flown, and more than one pilot is required under the type certification of the aircraft or the regulations under which the flight is being conducted."

Extent of Relief and Reason it is Sought

AirNet II, LLC seeks continued relief under exemption 17942 allowing the assignment of a SIC to flights that otherwise do not require a SIC and to allow the SIC to log that flight time subject to the conditions and limitations described in exemption 17942.

The Exemption which was granted after the amendment to 61.51(f)(3) dated June 27th 2018 has never been restricted to the Aircraft requirements of 135.99 (c).

How This Benefits the Public as a Whole

The benefits of providing this relief have been well established through the issuance of Exemption 17942. Expressly stated, some of the benefits include:

- 1) Providing SIC pilots actual "line" experience in on-demand and regularly scheduled charters in all weather conditions, demanding deadlines, with an airline "feel and function" including operational control procedures.
- 2) Providing pilots assigned as SIC and those assigned as PIC with earlier exposure to and an opportunity to utilize Crew Resource Management (CRM) skills that they will require throughout their career.
- 3) While not required for safe, legally compliant operations, this relief does enhance operational safety by placing a second properly trained and qualified pilot in the aircraft for such operations.

It is in the public interest for Second in Command pilots to gain valuable flight experience in the aircraft operated by AirNet and to operate in a crew environment prior to accepting other pilot positions.

Reasons Exemption Would Not Adversely Affect Safety / Equivalent Level of Safety

As stated previously, the benefits of providing this relief have been well established through the issuance of exemption 17942. Pilots participating in the program as SIC gain valuable experience in commercial operations prior to accepting positions where they are required to act as PIC. Overall program benefits include:

- Providing inexperienced pilots the opportunity to gain relevant experience in commercial operations earlier than is now possible.
- In the current environment where qualified pilots are in demand, this program reduces the time required for inexperienced pilots to gain valuable and directly relevant flight experience necessary to qualify for these positions, while also providing them opportunities to upgrade to positions where they can gain PIC experience that they might not otherwise receive if hired as an SIC for an airline.
- Enhances operational safety by placing a second properly trained and qualified pilot on such operations.

Summary

AirNet II, LLC seeks continued relief allowing the assignment of a SIC to flights that otherwise do not require a SIC and to allow the SIC to log that flight time.

Additional Information

No additional information.

Operations Outside of the United States

The same rationale for allowing this exemption within the United States applies for outside the United States.

Respectfully,



Brandon J. Hildreth
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