Firas Al Otaibi
Airline Transport Pilot 4246533
Certificate issued June 2019

2175 Widgeon Dr
Johnstown,Colorado 80534
Firas320@gmail.com
(970)3013845

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05 October 2021
Petition for Exemption 14 CFR &121.436(a)(3)

I am writing to request an exemption from 14 CFR121.436(a)(3) to the extent that my pilot in command time be considered to fulfill the requirements of 14 CFR 121.436(a)(3) air carrier experience

I started my career working for Royal Jordanian Airlines. I worked from 1988 to 2000 as a Flight Engineer B 727/L1011 and then First Officer L1011/A320 (2131 hours)flying under FAA/ CAA 121.

In 2000 I joined Gulf Air as a First Officer A320/A330/A340 (5630 hours). In 2008, I became a
Captain on A319/A320/A321 (3778 Hours under PART 121).

In 2013 I joined Saudia Airlines as Captain A319/A320/A321 (1523 hours). Saudia flies under FAA/ GACA part 121and I have the appropriate documents.

In 2016 I joined Air Arabia as a Captain A320/A321 (1122 hours under PART 121)

In 2019 I joined Bamboo Airways as a Captain A320/A321 (524 Hours under PART 121)

In March of 2020 Airbus USA hired me to work in Denver as the simulator instructor training Frontier Airlines Pilots (under FAA part 121) to fly Airbus A320/A32.

I have accumulated over 6887 hours as the Pilot In Command and 14060 total flying hours over the past 33 years of my flying career. All of my hours are accredited and certified. I can provide all the documents that qualify me under part 91.1053(a)(2)(I)

Based on my hours and years of experience, I would appreciate being considered for a waiver of part 121.436(a)(3) so I can continue my career as a Pilot in Command for Global Crossing Airlines.

Thank You.
Sincerely,
Captain Firas AlOtaibi
ATP 4246533

Capt. Firas F. Al-Otaibi
2175 Widgeon Drive
Johnstown CO 80534
(970)301-3845
firas320@gmail.com

Flight Hours	**Total Time**	**14050**
Pilot in Command	6588	
Multi-engine	14050	
Turboprop	255	
Second in Command	7462	
Instrument	1420	
Instructor	236	
Turbine PIC	6588	
Night	8871	

Certificates & Ratings:

Airline Transport Pilot:

- FAA ATPL Airplane Multi-engine Land A-320
- Vietnam ATPL Aeroplane Multi-engine Land A319/320/321
- United Arab Emirates ATPL IR/MPA A320
- Kingdom of Saudi Arabia ATPL Airplane Multi-engine Land A-320
- Kingdom of Bahrain ATPL Multi-engine Land P1: A320 P2: A330/A340
- Sultanate of Oman ATPL Multi-engine IR A320/A330/A340

Commercial Privileges: ASEL/AMEL
Type Ratings: B-727/L 1011-500/A319/A320/A321
FCC Restricted Radiotelephone Operators Permit
Certified Flight Instructor: Multi-engine A320 (Frontier Airlines)
FAA First Class Medical Certificate
US Passport: Current, Unrestricted

Experience:

02/21 to Pres. Global Crossing Airlines, Building 5A Miami International Airport, Miami FL 33166
Instructor A320
Pilot A320

Supervisor: Hector Crocker- (786)-751-8506

03/20 to Pres. Airbus Instructor , 3500 N Windsor Drive Suite 500 Aurora, CO 80113

CFI: A320 for Frontier Airlines Part 121

- Training of new hire pilots
- Teaching of Frontier procedures and regulations
- Responsible for operating the SIM for Frontier Pilots
- Goal is having successful completion of A320 type rating for Frontier pilots. Instruction given in a positive and professional manner.
- Hours Worked: 236

Supervisor: David Tzouanakis- (859)-327-0632

06/19 to 02/20 Bamboo Airways, N01-T3 So 1, Khu Ngoai giao doan, Tu Liem, Ha Noi, Vietnam

Captain A320 Family

- Responsible for safe operations and timely transport of passengers.
- Hours Worked: 188

Supervisor: Eddie Doyle-+84787060343

11/16 to 11/18 Air Arabia, Saif Zone, Sharjah, United Arab Emirates

Captain A320 Family

- Responsible for safe operations and timely transport of passengers.
- Hours Worked: 1212

Supervisor: Khalid Fahdi-+96895188222

11/13 to 11/16 Saudi Airlines, Airport Road, Jeddah, Saudi Arabia

Captain A320 Family under FAA/GACA Part 121

- Responsible for safe operations and timely transport of passengers.
- Hours Worked: 1777

Supervisor: Khalid Sayyed-+966502464166

03/00 to 11/13 **Gulf Air Airlines,** 7J9G+Q9 Muharraq, Bahrain

First officer A320/A330/A340 and Captain A320/321

- Responsible for safe operations and timely transport of passengers.
- Hour Worked: 8742

Supervisor: Khalid Fahdi-+96895188222

05/91 to 03/00 **Royal Jordanian Airlines,** Mohammad Ali Jinnah St 37, Amman, Jordan

FO L 1011/A320, Flight Engineer L 1011/B 727

- Responsible for assisting Captain in the safe operation and timely transport of passengers.
- Offered technical support to the Captain
- Hours Worked: FO 2131/FE 2021

Supervisor: Faris Al-Sayyed- deceased

Point of Interest Multiple Oceanic, North American, European, African, Asian, Far Eastern, Middle East, and Australian operations: proficiencies in out-of-radar coverage, class II navigation and HF radio operations; both trained in and operated in special Atlantic, Indian Ocean, and Bangal Bay. American, European, African, and Asian high altitude airports, depressurization escape procedures, reduced aircraft performance and non-standard ATC facilities.

Systems: RVSM, EFB, CPCALC, IPAD, Jeppesen flight deck, EFIS, FMS, TCAS II, EGPWS, RWOP, SAT-COMM

Knowledge WAAS

Education Royal Jordanian Air Academy, Amman, Jordan

Aviation Degree: Oxford Aviation Syllabus

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CHAPTER 3 – AIRMAN CERTIFICATE REQUIREMENTS – AIRWORTHINESS

3.1 GENERAL:

3.1.1. Pending ratification of the Kingdom of Saudi Arabia's Civil Aviation Regulations, the GACA has adopted and is presently operating in accordance with the United States Federal Aviation Administration Regulations and GACA Aeronautical Information Publication.

3.1.2. Procedures contained in this Advisory Guide will govern the method of issuing and renewing GACA Airman Certificates and validating a foreign certificate or license issued by another ICAO member state authority.

3.1.3. Applicants for a GACA Airman Certificate are normally employed by a GACA Part 91, 91K, 121, 125, 133, 135, 137, 141 and 142 certificated domestic sponsors or certificate holders operating under the provisions of the GACA/FAR Parts 91, 91K, 121, 125, 133, 135, 137, 141 or 142.

3.1.4. Applicants for a GACA Airman Certificate, Repairman, are normally employed by a GACA 145 certificated repair stations or certificate holders operating under the provisions of the GACA/FAR Part 121, 125, 135, or 137.

3.1.5. When a GACA certificated Repairman is employed by a certificate holder operating under the provisions of the GACA/FAR Part 121,125,135 or 137 and that certificate holder operates a single Airman certificate provided that the ratings held are relevant to the organizations.

3.1.6. An applicant for a GACA certificate IA must be the holder of a current FAA, IA certificate and a GACA Mechanics certificate A & P and is in compliance with GACA/FAR Part 65, Section 65.91, 92 and 95.

3.1.7. An applicant for a GACA Airman certificate Repairman must be qualified to perform maintenance on aircraft or components thereof, appropriate to job for which he is employed. He also must be employed for a specific job requiring those special qualifications by a certificated repair station, certificated commercial operator, or certificated air carrier.

3.1.8 Only a GACA certificate holder may perform or supervise and certify for the maintenance, preventative maintenance, or alternation of aircraft components and appliances appropriate to his job and within the scope of his ratings and duties to which he was employed. If the work was performed by a person who is not a GACA Airman certificate holder it is the responsibility of an appropriately qualified GACA Airman certificate holder to properly supervise the person performing the work and to certify for its completion.

3.1.9 Only a GACA certificate holder Mechanic, rating dual Airframe and power plant, or an IA may certify in accordance with GACA/FAR Part 43, for the final release of an aircraft.

3.1.10 A Certificate holder may only exercise the privileges of his certificate providing he has been properly trained (Approved courses, Manufacturer, OJT etc) and is fully familiar with the Aircraft, component or appliance he is certifying for.

3.2. COMPLIANCE:

3.2.1 Aircraft owners, operators, repair station and airman certificate holders must comply with the instructions contained within this Advisory guide. The requirements become effective as of March 1, 2009. Applications received prior to the effective date will be assessed against AG 1 issue 3 dated Feb. 2004. All sponsors utilizing this Advisory Guide must ensure that their employees are well informed about the GACA-S & ER requirements. It is incumbent that Individual applicants utilize this AG to ensure complete

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CHAPTER 4 – AIRMAN CERTIFICATE REQUIREMENTS – OPERATIONS

4.1 GENERAL:

4.1.1. Pending ratification of the Kingdom of Saudi Arabia's Civil Aviation Regulations, the GACA has adopted and is presently operating in accordance with the United States Federal Aviation Administration Regulations and GACA Aeronautical Information Publication.

4.1.2. Procedures contained in this Advisory Guide will govern the method of issuing and renewing GACA Airman Certificates and validating a foreign certificate or license issued by another ICAO member state authority.

4.1.3. Applicants for a GACA Airman Certificate are normally employed by a GACA Part 91, 91K, 121, 125, 133, 135, 137, 141 and 142 certificated domestic sponsors or certificate holders operating under the provisions of the GACA/FAR Parts 91, 91K, 121, 125, 133, 135, 137, 141 or 142.

4.2 COMPLIANCE:

4.2.1. Aircraft owners, operators, repair station and airman certificate holders must comply with the instructions contained within this Advisory guide. The requirements become effective as of 01 March, 2009. Applications received prior to the effective date will be assessed against AG 1 issue 3 dated Feb. 2004. All sponsors utilizing this Advisory Guide must ensure that their employees are well informed about the GACA-S & ER requirements. It is incumbent that Individual applicants utilize this AG to ensure complete applications are submitted accurately and ensure that submission is timely.

4.3 VALIDITY OF GACA AIRMAN'S CERTIFICATE:

4.3.1. Unless the certificate is suspended or revoked by the GACA-S & ER, an Airman certificate is effective until the holder;

a. Validity as endorsed on the certificate is expired.
b. The certificate holder can not comply with the authorizations and responsibilities of the certificate.
c. The holders of I.D. (Passport) or Iqama details change that affectively changes the details stated on their Airman Certificate.
d. Certificate holder has not complied with applicable parts of GACA/FAR requirements.

4.4 TEMPORARY CERTIFICATE:

4.4.1 A temporary certificate may be issued, based on ICAO member state temporary certificate for a period of not more than 120 calendar days. GACA issuance of a permanent certificate may be granted pending GACA-S & ER review of Applicants' applications and supporting documentation. It is incumbent on the applicant to be proactive and ensure his certificate privileges do not expire. If the applicant has not received his permanent airman certificate 90 days after issuance, he must initiate actions to ensure processing of the permanent certificate is commenced prior to the 120 days form issuance of the temporary certificate.

4.5 SURRENDERED CERTIFICATES

4.5.1 When a certificate no longer valid, the holder is responsible for returning the certificate to the GACA-S & ER within 30 calendar days of it becoming invalid.

4.6 DISPLAY OF CERTIFICATE

4.6.1 The holder of Airman Certificate shall keep the original certificate immediately available and shall present it for inspection upon request of an authorized representative of the GACA-S & ER.

4.7 CHANGE OF HOLDER'S NAME

4.7.1 An application for a GACA Airman Certificate holder for a change of name on his certificate must be accompanied by the applicants current GACA airman certificate

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Foreign air carriers (Part 129)

Foreign air carriers or operators who would like to conduct passenger or cargo operations to, from, and transiting the United States, must obtain a permit issued by the Department of Transportation (DOT) under Title 49 of the United States Code (49 U.S.C.). The Federal Aviation Administration (FAA), International Field Offices (IFO) are responsible for issuance and amendment of foreign air carrier operation specification (OpSpecs). Operating standards governing foreign operators are contained in Parts 91 and 129.

Each foreign air carrier conducting operations within the United States must conduct its operations in accordance with the Standards contained in Annex 1 (PDF) (Personnel Licensing), Annex 6 (PDF) (Operation of Aircraft), Part I (International Commercial Air Transport–Aero planes) or Part III (International Operations–Helicopters), Annex 8 (PDF) (Airworthiness of Aircraft) and Annex 18 (PDF) (The Safe Transport of Dangerous Goods by Air).

Regulations outlining the acceptance, handling, transport of dangerous goods and required training are found in the Hazardous Material Regulations (49 CFR Parts 100-185) and the International Civil Aviation Organization (ICAO) Technical Instructions (TI) for the Safe Transportation of Dangerous Goods by Air. Compliance with the ICAO TI (including U.S. State Variations) as well as 49 CFR 175 regulations is mandatory for all Part 129 air carriers.

of Transportation
Federal Aviation Administration

WEB Address: http://registry.faa.gov

March 20, 2019

FAA
SO FSDO 19 (South Florida)
2895 S.W. 145 AVENUE SUITE 120
MIRAMAR FL 33027

The Airmen Certification Branch, AFB-720, has received the attached confirmation that the following airman's foreign license and medical certificate or endorsement have been verified as current and valid by the United Arab Emirates Civil Aviation Authority.

Name: Firas Faris Ali Al Otaibi
License Number(s): 86257

The expiration date shown on this letter may be less than six months due to time restrictions shown on the verification provided by CAA.

The Airmen Certification Branch only verified the applicant's foreign license number, the level of the license, and that the license has not been surrendered, suspended, revoked, or expired.

NOTE REGARDING EXPIRED RATINGS: Before exercising the privileges of the FAA pilot certificate, the pilot must comply with the pertinent rules and requirements contained in 14 CFR Part 61 and 14 CFR Part 91. (§61.56 flight review requirements, §61.57 recency of experience requirements, §61.58 PIC proficiency check, §61.51 required logbook entries, etc.)

If the applicant is applying for an Airline Transport Pilot--Airplane Multiengine Class rating in conjunction with a Type rating and using their foreign Commercial with Instrument privileges or a foreign ATP license as the prerequisite, the applicant must hold either a current Airplane Multiengine Class Rating or a current PIC Type Rating on the foreign license prior to taking the FAA practical test. This is in accordance with the ATP Practical Test Standards (PTS) – FAA-S-8081-5F.

Some ratings shown on a verification letter may not be eligible for conversion to an FAA certificate. Airmen Certification has verified the authenticity of the applicant's foreign license, but the applicant MUST still provide appropriate documentation that the rating(s) held on the foreign license parallel U.S. rating(s) in accordance with 14 CFR §61.5(b) or §63.33(a). The Flight Standards District Office or Designated Examiner has the responsibility to determine if the ratings on the foreign license conform to the appropriate Code of Federal Regulation.

This applicant is authorized to apply for a U.S. airman certificate in accordance with 14 CFR

§ 121.436 Pilot Qualification: Certificates and experience requirements.

(a) No certificate holder may use nor may any pilot act as pilot in command of an aircraft (or as second in command of an aircraft in a flag or supplemental operation that requires three or more pilots) unless the pilot:

(1) Holds an airline transport pilot certificate not subject to the limitations in § 61.167 of this chapter;

(2) Holds an appropriate aircraft type rating for the aircraft being flown; and

(3) If serving as pilot in command in part 121 operations, has 1,000 hours as second in command in operations under this part, pilot in command in operations under § 91.1053(a)(2)(i) of this chapter, pilot in command in operations under § 135.243(a)(1) of this chapter, or any combination thereof. For those pilots who are employed as pilot in command in part 121 operations on July 31, 2013, compliance with the requirements of this paragraph (a)(3) is not required.

§ 91.1053 Crewmember experience.

(a) No program manager or owner may use any person, nor may any person serve, as a pilot in command or second in command of a program aircraft, or as a flight attendant on a program aircraft, in program operations under this subpart unless that person has met the applicable requirements of part 61 of this chapter and has the following experience and ratings:

(1) Total flight time for all pilots:

(i) Pilot in command - A minimum of 1,500 hours.

(ii) Second in command - A minimum of 500 hours.

(2) For multi-engine turbine-powered fixed-wing and powered-lift aircraft, the following FAA certification and ratings requirements:

(i) Pilot in command - Airline transport pilot and applicable type ratings.

(ii) Second in command - Commercial pilot and instrument ratings.

(iii) Flight attendant (if required or used) - Appropriately trained

of Transportation
Federal Aviation
Administration

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

MAR 7 2014

Mr. Zachary Kelley
PO Box 837
Girdwood, AK 99587

Dear Mr. Kelley:

This letter is provided in response to your request for a legal interpretation sent to me on November 7, 2013. In your request, you present two scenarios and question the application of 14 C.F.R. § 121.436(a)(3), the requirement for 1,000 hours of pilot experience prior to service as a pilot in command (PIC) in part 121 operations, to those scenarios.

Section 121.436(a)(3) provides the requirement for a pilot to have 1,000 hours of air carrier operations experience prior to serving as PIC in part 121 operations. The 1,000 hours of air carrier operations experience may be a combination of time serving as second in command (SIC) in part 121 operations or serving as PIC in operations conducted under §§ 91.1053(a)(2)(i) or 135.243(a)(1). Pilots serving as PIC in part 121 operations on July 31, 2013, are excepted from the 1,000-hour air carrier operations experience requirement.[1]

Section 91.1053(a)(2)(i) operations use multi-engine turbine-powered fixed wing and powered-lift aircraft for which a PIC must hold an airline transport pilot (ATP) certificate and applicable type ratings. Section 135.243(a)(1) operations are passenger carrying operations using a turbojet with a passenger-seat configuration of 10 seats or more, or using a multiengine airplane in a commuter operation for which the PIC must hold an ATP with appropriate category and class ratings and, if required, an appropriate type rating.

14 CFR § 135.243 - Pilot in command qualifications.

CFR

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§ 135.243 Pilot in command qualifications.

(a) No certificate holder may use a person, nor may any person serve, as pilot in command in passenger-carrying operations -

(1) Of a turbojet airplane, of an airplane having a passenger-seat configuration, excluding each crewmember seat, of 10 seats or more, or of a multiengine airplane in a commuter operation as defined in part 119 of this chapter, unless that person holds an airline transport pilot certificate with appropriate category and class ratings and, if required, an appropriate type rating for that airplane.

(2) Of a helicopter in a scheduled interstate air transportation operation by an air carrier within the 48 contiguous states unless that person holds an airline transport pilot certificate, appropriate type ratings, and an