POSITION PAPER

QUALITY OVER QUANTITY: WHY THE 1,500-HOUR RULE IMPEDES SAFETY AND PILOT DEVELOPMENT

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Congress should enact legislation modifying the requirements for the Airline Transport Pilot (ATP) certificate and replace it with a modernized, competency-based training framework. Enacted under the Airline Safety and Federal Aviation Administration Extension Act of 2010 (Public Law 111-216), the mandate was a well-intentioned but fundamentally flawed response to commercial aviation accidents. Decades of safety data, modern training science, and international operational precedents demonstrate that arbitrary hour accumulation does not correlate with increased cockpit safety. By prioritizing unstructured solo flight hours over rigorous, mission-specific simulator and multi-crew training, current federal regulations compromise pilot readiness and restrict the talent pipeline.

EXECUTIVE SUMMARY

United States modify the rigid 1,500-hour minimum flight time requirement[1] for the Airline Transport Pilot (ATP) certificate and replace it with a modernized, competency-based training framework. Enacted under the Airline Safety and Federal Aviation Administration Extension Act[2] of 2010 (Public Law 111-216), the mandate was a well-intentioned but fundamentally flawed response to commercial aviation accidents. Decades of safety data, modern training science, and international operational precedents demonstrate that arbitrary hour accumulation does not correlate with increased cockpit safety. By prioritizing unstructured solo flight hours over rigorous, mission-specific simulator and multi-crew training, current federal regulations compromise pilot readiness and restrict the talent pipeline.

THE LEGAL AND REGULATORY FRAMEWORK

The mandate, informally known as the "1,500-hour rule," is promulgated by federal statute and codified in Public Law 111-216 (2010). Following the tragic crash of Colgan Air Flight 3407[3], Congress bypassed standard regulatory rulemaking to mandate that all commercial airline first

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[1] Airline Safety and Federal Aviation Administration Extension Act of 2010, Pub. L. No. 111-216, § 217, 124 Stat. 2348, 2367 (codified at 49 U.S.C. § 44703 note).

[2] 14 C.F.R. § 61.159 (2025) (detailing aeronautical experience requirements for the airline transport pilot certificate); 14 C.F.R. § 121.436 (2025) (establishing pilot qualification requirements for Part 121 air carrier operations).

[3] National Transp. Safety Bd., NTSB/AAR-10/01, Aircraft Accident Report: Loss of Control on Approach, Colgan Air, Inc., Operating as Continental Connection Flight 3407, Bombardier DHC-8-400, N200WQ, Clarence Center, New York, February 12, 2009, at 134–35 (2010) (concluded the captain had 3,379 hours and the first officer had 2,244 hours, demonstrating that total flight time did not prevent catastrophic deficiencies in stall recovery protocol).

officers hold an ATP certificate. In 2013, the Federal Aviation Administration (FAA) codified this law into Federal Aviation Regulations. This raised the minimum flying threshold for airline first officers from 250 hours to 1,500 hours of total flight time, with narrow restrictions for military and specific university graduates (Restricted ATP). The categories for meeting the R-ATP requirement acknowledge quality training can be considered in lieu of some of the 1,500 hours required but does not do enough to provide relief to those who earn their licenses and certificates under 14 CFR Part 61. One category for obtaining the R-ATP is for U.S. military pilots who have a minimum of 750 hours. This is unrealistic for most since the active-duty service commitment for both the U.S. Air Force and U.S. Navy pilots are ten and eight years respectively[4]. A military pilot separating or retiring from the military will have significantly more hours than 750. While proponents cite the subsequent low accident rate as proof of the rule's success, this narrative ignores parallel advancements in flight deck technology, predictive safety programs, and Advanced Aviation Training Device (AATD) enhancements that occurred concurrently.

THE SAFETY CASE AGAINST ARBITRARY HOURS

The primary flaw of the 1,500-hour rule is its reliance on quantity over quality. During the initial rulemaking process, statistical analysis by the FAA found no demonstrable relationship between a pilot's total flight hours and their probability of being involved in an accident. Both pilots in the Colgan Air accident already possessed far more than 1,500 hours yet lacked proficiency in stall recovery and crew resource management. To log 1,500 hours quickly and cheaply, aspiring pilots frequently fly small, single-engine aircraft in perfect weather or function as flight instructors in non-complex environments. This unstructured time fails to prepare a pilot for navigating heavy transport-category jets through complex airspace, severe weather, or high-altitude automation management. A better alternative is to focus on quality training rather than the quantity of hours. In April of 2022, Republic Airways petitioned the FAA unsuccessfully to allow their flight academy graduates relief from the 1,500-hour requirement and allow them to obtain their ATP within 750 hours[5]. Even U.S. military pilot training programs graduate pilots approximately 180 – 250 hours of total time[6]. The difference is military training is structured, intense, uses high performance aircraft, and prepares the graduate to be a fully capable pilot in their follow-on unit.

DATA-DRIVEN ALTERNATIVES: COMPETENCY-BASED TRAINING

Global safety data supports a significant reduction in total hours when paired with highly structured, mission-specific training**.** Under the International Civil Aviation Organization

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[4] U.S. Air Force, *Fighter Pilot*, U.S. Air Force Careers, airforce.com;
10 U.S.C. § 653.

[5] Gregory Polek, *FAA Denies Republic's Proposed Exemption from 1,500-hr Rule*, AIN Online (Sept. 19, 2022), https://www.ainonline.com/aviation-news/air-transport/2022-09-19/faa-denies-republics-proposed-exemption-1500-hr-rule.

[6] *Boosting Readiness: AETC's Plan to Train 1,500 Pilots Annually*, U.S. Air Force (June 6, 2025), https://www.af.mil/News/Article-Display/Article/4208427/boosting-readiness-aetcs-plan-to-train-1500-pilots-annually/;
Training Air Wing Two | Curriculum, Chief of Naval Air Training, https://www.cnatra.navy.mil/tw2/curriculum.asp.

(ICAO) standards, regions like Europe safely employ the Multi-Crew Pilot License (MPL). The MPL allows co-pilots to enter commercial service with 200 to 500 hours of flight time. These pilots train from day one in multi-crew simulators simulating actual airline environments, achieving safety records that match or exceed U.S. standards. Academic and industry research emphasizes that safety outcomes are maximized through Evidence Based Training (EBT). EBT utilizes advanced flight simulators to expose students to high-risk operational scenarios that cannot be safely replicated in real, light aircraft.

OPERATIONAL IMPACT

Beyond safety, the 1,500-hour barrier introduces severe systemic vulnerabilities. Aspiring pilots face an estimated $80,000 to $100,000, or more, in additional out-of-pocket costs just to log unstructured time[7]. This disproportionately blocks lower-income candidates from entering the profession. The financial and temporal cost of the rule has bottlenecked the pilot supply chain. This has resulted in widespread route cancellations, forcing regional carriers to abandon service to dozens of small and rural American communities.

CONCLUSION AND RECOMMENDATION

The 1,500-hour rule is an outdated, regulatory reaction that prioritizes logbook entries over genuine airmanship. To protect public safety and secure the future of the aviation ecosystem, the United States must align with modern training techniques. Congress should amend Public Law 111-216 to grant the FAA the authority to approve an alternative, highly structured training pathway. Transitioning from an arbitrary 1,500-hour requirement to a strict competency-based training framework utilizing advanced simulators could safely reduce the required flight time down to 750 hours, while producing fully capable first officers.

[7] Ryan Ewing, *The 1,500-Hour Rule Explained*, AirlineGeeks (Nov. 12, 2025), https://airlinegeeks.com/2025/11/12/the-1500-hour-rule-explained/.