

THE REPUBLIC RC-3 SEABEE AND SPORT PILOT PRIVILEGES UNDER MOSAIC

Aircraft eligibility under 14 CFR § 61.316 • Pilot requirements, endorsements, and operating limitations • Type Certificate A-769 • August 29, 2026

1. Conclusion

The RC-3 Seabee, as type-certificated under Aircraft Specification A-769, meets the aircraft performance limits and design requirements of 14 CFR § 61.316 as amended by the FAA's MOSAIC final rule. The CAA Approved Airplane Flight Manual (approved October 15, 1947) establishes a power-off clean stall speed (VS1) of 61 mph True Indicated Airspeed at the 3,150 lb Normal-category maximum weight. "True Indicated Airspeed" is the CAR 3-era term for indicated airspeed corrected for instrument and position error — what is now called calibrated airspeed. 61 mph = 53.0 KCAS, six knots under the 59 KCAS limit of § 61.316(a)(1). Because these are original certification values, the conclusion applies to every RC-3 built under the type certificate.

The Seabee is not, and does not become, a light-sport aircraft. LSA is an airworthiness category (§ 21.190) for newly certificated aircraft; MOSAIC created no path to reclassify a type-certificated airplane. Every RC-3 keeps its standard airworthiness certificate, stays a Normal/Utility airplane, and stays on Part 43 maintenance with an A&P/IA annual. What MOSAIC changed is who may fly it: sport pilot privileges (§§ 61.303, 61.315, 61.316) are no longer tied to the LSA category and now extend to any aircraft meeting the § 61.316 limits. The sport pilot amendments took effect October 22, 2025 (final rule published July 24, 2025, Docket FAA-2023-1377).

2. Criteria of § 61.316(a) Applied to the RC-3

§ 61.316(a) covers an aircraft that, "since its original certification," meets the following (gyroplane, helicopter, and glider criteria omitted):

Criterion	RC-3 Seabee	Result	Source
(a)(1) VS1 ≤ 59 KCAS at max certificated takeoff weight and most critical CG	AFM Table 5: 61 mph TIAS, gear/flaps up, Normal category, 3,150 lb = 53.0 KCAS	MEETS	CAA AFM Tables 5, 9
(a)(2) Max seating four persons (airplanes)	TCDS: "No. seats: 4 (two at +62, two at +96)"	MEETS	TCDS A-769 Rev. 15
(a)(3) Unpressurized cabin	Unpressurized	MEETS	TCDS A-769
(a)(5) Partial power loss does not adversely affect directional control	Single-engine centerline-thrust pusher	MEETS	Design
(a)(8) Fixed landing gear, except per (b)	Retractable amphibious gear — permitted under (b) with § 61.331(a) training/endorsement	MEETS via (b)	§ 61.316(b), § 61.331(a)
(a)(9) Fixed, ground-adjustable, or automated controllable-pitch prop, except per (b)	Hartzell HC-12X20 manually selective-pitch reversible — permitted under (b) with § 61.331(b) training/endorsement	MEETS via (b)	§ 61.316(b), § 61.331(b)

3. The Stall Speed Evidence

CAA AFM Table 5 (Stalling Speeds) and Table 9 (Performance at Sea Level), power off, maximum weight:

Configuration	Normal (3,150 lb)	Utility (2,810 lb)
VS1 — clean (gear up, flaps up)	61 mph TIAS = 53 KCAS	53 mph TIAS = 46 KCAS
VS0 — landing (gear down, flaps 30°)	58 mph TIAS = 50 KCAS	47 mph TIAS = 41 KCAS

Which weight. § 61.316(a)(1) evaluates VS1 "at the aircraft's maximum certificated takeoff weight" — the 3,150 lb Normal-category figure. The lower Utility figures are not used.

Why TIAS is CAS. The 1947 manual predates the term "calibrated airspeed." Under the Civil Air Regulations, "true indicated airspeed" meant indicated airspeed corrected for instrument and position error — the § 1.1 definition of CAS today. The AFM proves it internally: its Airspeed Calibration table (Ship 170 and up) is headed "Indicator Reading" vs. "True Indicated Airspeed," which is by definition a position-error correction chart (55 → 56, 60 → 60, 65 → 65, 70 → 69 mph). The stall speeds are already on the corrected scale; only a unit conversion remains: 61 mph × 0.869 = 53.0 KCAS.

Cross-checks. AFM Table 1 arcs (green 61, white 58 mph) match Table 5. The Owners Manual's 66 IAS clean, run through the calibration table (≈ 65 TIAS), is 56.5 KCAS — still under. Service News No. 41 (1947) notes roof-pitot airplanes read 3–6 mph low with cabin vents open; that affects the needle, not the aerodynamic stall.

4. Modified Seabees and "Since Its Original Certification"

AC 61-146 adds that an alteration which lowers stall speed cannot be used retroactively to gain eligibility. Applied to common Seabee modifications:

- **Engine conversions** (Lycoming GO/GSO/IGSO-480 under STCs such as SA282NW, SA615NW, SA5684NM; Cooper TIO-540/IO-540). Power-off stall is a property of wing, weight, and configuration, not powerplant. The certified 61 mph figure is unaffected.
- **Wing extensions, droop tips, VGs, fences.** Post-certification and not relied upon; they lower actual stall speed, the conservative direction.
- **Gross-weight increases — the one to check.** Some STCs raise maximum takeoff weight (e.g., SA5734NM, to 3,254 lb). Stall speed scales with the square root of weight: 61 mph at 3,150 lb becomes about 62 mph (54 KCAS) at 3,254 lb, still well under 59 KCAS — but an owner with such an STC should confirm whether its AFM Supplement publishes a stall speed, because that is the document a reviewer will ask for.
- **Flying-boat versions** (TCDS Notes 4–6, gear removed): stall speeds unchanged; the § 61.331(a) retractable-gear endorsement does not apply.

5. Flying a Seabee Without an FAA Medical Certificate: Driver's-License Medical vs. BasicMed

Two paths let a pilot fly a Seabee with no Part 67 medical. They are different rules with different prerequisites and different privileges. A private, commercial, or ATP holder may use either; a sport pilot certificate holder may use only the driver's-license path (or hold a medical or BasicMed).

	DRIVER'S-LICENSE MEDICAL	BASICMED MEDICAL
Rule	§ 61.303 (sport pilot privileges)	§ 61.113(i) and Part 68
Who can use it	Sport pilot certificate holders; recreational, private, commercial, and ATP holders	Private pilot or higher only (not sport or recreational certificates)
Prerequisites	Current, valid U.S. driver's license • No medical certificate needed — ever, including pilots who have never held one • If a medical was ever applied for: the most recent application was found eligible for at least third class, and the most recent certificate was not denied, suspended, or revoked and no special issuance withdrawn • Comply with every restriction on the driver's license and any court or administrative order applying to it • No known or reasonably suspected medical condition that would make safe operation impossible	Held any FAA medical certificate at any time after July 14, 2006 (a lapsed one is fine) • Most recent medical not revoked, suspended, or withdrawn, and most recent application not denied • Current, valid U.S. driver's license • Comprehensive Medical Examination Checklist (CMEC, FAA Form 8700-2) completed by a state-licensed physician within the preceding 48 months • FAA-approved online medical education course (AOPA or Mayo Clinic) completed within the preceding 24 calendar months • One-time special issuance required for listed cardiac, neurological, and mental-health conditions • CMEC (Comprehensive Medical Examination Checklist) and course certificate kept in the logbook
What you can fly	Only aircraft meeting § 61.316 — the Seabee qualifies (VS1 53 KCAS, 4 seats, single engine)	Any aircraft up to 7 occupants and 12,500 lb max takeoff weight — the Seabee qualifies with wide margin
Operating limits	All of § 61.315(c) (Section 7): one passenger, day VFR, ≤ 10,000 ft MSL / 2,000 ft AGL, 3 sm visibility, surface reference, U.S. only, no compensation	Up to 6 passengers • VFR or IFR • ≤ 18,000 ft MSL • ≤ 250 kt • Within the U.S. and countries that accept BasicMed • Not for compensation or hire • Night permitted • Otherwise the full privileges of the certificate held
Endorsements for a Seabee	Sport pilot: all items in Section 6. Higher-certificate holder with ASEL and ASES: none additional per the § 61.303 table	None beyond the normal Part 61 requirements for the certificate held (complex endorsement, high-performance if > 200 hp, seaplane rating)
Best fit	Sport pilots; pilots who never held a medical after July 14, 2006; pilots who cannot get a BasicMed special issuance	Any private-or-higher holder who qualifies — strictly more capability with no § 61.315 limits

Bottom line for a higher-certificate holder: if you have held a medical since July 14, 2006 and can pass the CMEC exam, BasicMed keeps your full certificate privileges in the Seabee — night, IFR, three passengers, and flight to countries that accept BasicMed (Canada, the Bahamas, and Mexico do). The driver's-license path costs you the § 61.315 limitations in exchange for needing no medical history at all.

6. Endorsements and Tests a Sport Pilot Needs to Fly a Seabee

Items 1–5 are required for any Seabee operation as an amphibian; 6–7 depend on the flying intended.

1. **ASES class privilege — § 61.321(b).** Practical test with an examiner (no proficiency-check shortcut for airplane classes). Already held if the certificate was issued in ASES.
2. **ASEL class privilege — § 61.321(b).** Practical test. FAA treats an amphibian as a seaplane on water and a landplane on a runway; ASES-only privileges limit the pilot to water operations. Both are needed to use the airplane as designed (confirm with FSDO under amended Subpart J).

3. **Retractable landing gear — § 61.331(a).** Ground and flight training plus logbook endorsement in a retractable-gear aircraft, or the § 61.31(e) complex endorsement. § 61.331(c) grandfathers pilots with PIC time in water-based retractable-gear aircraft logged before October 22, 2025.
4. **Manual controllable-pitch propeller — § 61.331(b).** Training plus endorsement, or § 61.31(e). The Seabee's Hartzell is pilot-selected pitch, not an automated constant-speed installation, so this applies.
5. **VH greater than 87 KCAS — § 61.327(a).** The RC-3's maximum level-flight speed (~120 mph / 104 kt) exceeds 87 KCAS. Training plus endorsement required.
6. **Class B, C, D airspace — § 61.325** (if needed). Training plus endorsement.
7. **Night — § 61.329** (if desired). Three hours night training including a 25-nm night cross-country and 10 full-stop night landings, endorsement, and a Part 67 medical or BasicMed. Not available on a driver's license alone.

Not required: a high-performance endorsement. § 61.31(f) governs private-and-higher certificates exercising those certificates; engine-converted Seabees above 200 hp are addressed by the § 61.316 performance limits, not a horsepower threshold.

7. Operating Limitations Under § 61.315(c)

Every pilot exercising sport pilot privileges in a Seabee — a sport pilot, or a higher-certificate holder on a driver's license — is bound by all 21 limitations. The pilot may not act as PIC:

1. Carrying a passenger or property for compensation or hire	12. When flight or surface visibility is less than 3 statute miles
2. For compensation or hire	13. Without visual reference to the surface (no VFR-on-top)
3. In furtherance of a business	14. In an aircraft with VH > 87 KCAS without § 61.327 endorsement (applies)
4. Carrying more than one passenger (Seabee: two of four seats occupied)	15. Contrary to any airworthiness-certificate or aircraft operating limitation
5. At night, except under § 61.329 (needs medical/BasicMed)	16. Contrary to any limit on the pilot certificate, medical, or FAA authorization
6. In Class A airspace	17. Contrary to any restriction on the U.S. driver's license or order applying to it
7. In Class B, C, or D airspace without § 61.325 endorsement	18. While towing any object
8. Outside the United States without prior foreign-authority authorization (Canada, Bahamas)	19. As a required crewmember on an aircraft needing more than one pilot
9. Demonstrating the aircraft in flight to a prospective buyer	20. In an aircraft with retractable gear or manual controllable-pitch prop without § 61.331 endorsement (applies)
10. In a charity-sponsored passenger-carrying airlift	21. In an aircraft requiring a type rating
11. Above 10,000 ft MSL or 2,000 ft AGL, whichever is higher	Expense sharing (§ 61.315(b)): fuel, oil, airport, rental only; pilot pays at least half

8. Open Items

- AFM Table 5 does not state CG. CAR 3 required stall speeds at the most unfavorable weight/CG, so the certified figure is presumed to satisfy "most critical CG"; not verified against the original flight-test report.
- TCDS A-769 lists airspeed limits in TIAS but no stall speed; the AFM is the primary source. AFM figures here were OCR-transcribed from the republicseabee.com copy — confirm against the physical AFM.
- No FAA guidance found that addresses pre-1950 "true indicated airspeed" manuals directly; the CAS equivalence rests on the CAR definition and the AFM's own calibration table. Amphibian ASEL+ASES interpretation and the § 61.303 no-additional-endorsement reading should be confirmed with the FSDO.

9. References

14 CFR Part 61 Subpart J (§§ 61.303, .315, .316, .321, .325, .327, .329, .331), § 61.31(e), § 61.113(i), eCFR.gov • FAA, Modernization of Special Airworthiness Certification, Final Rule, July 24, 2025, Docket FAA-2023-1377, federalregister.gov/d/2025-13972 • FAA AC 61-146 (Nov. 2025); AC 90-89C (2023) • CAA Approved Airplane Flight Manual, Republic RC-3, Oct. 15, 1947, Tables 1, 5, 9 and Airspeed Calibration, republicseabee.com/Files/CAA Approved Flight Manual Web.pdf • FAA Aircraft Specification A-769 Rev. 15 (1992), republicseabee.com/Files/A-769.pdf • Republic Seabee Owners Manual • Republic Service News No. 41, July 28, 1947, republicseabee.com/Files/Seabee_SN-41.pdf • Summary of FAA STCs, Republic RC-3, republicseabee.com/Files/Seabee STC.pdf • AOPA, "MOSAIC Explained: FAQ" (Aug. 2025), "Details Matter" (Nov. 2025), "Post-MOSAIC guidance updated" (Dec. 2025).

Owner-prepared technical analysis; not an FAA determination. Does not substitute for the CAA Approved Airplane Flight Manual, the current eCFR text, or the judgment of a qualified instructor, A&P/IA, or FAA inspector.