WESTERN MICHIGAN UNIVERSITY

College of Aviation
Office of the Dean

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Associate Dean

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Part 147 ARAC Update

Dear ATEC Member Institutions,

I hope 2010 is off to a positive start for each of you. Many of you have been inquiring about the FAR Part 147 ARAC process. Let me take a few moments to update you on the status of the ARAC.

The Part 147 ARAC Working Group was commissioned in summer 2007. The group consists of representatives from all levels of aviation maintenance schools, industry and professional organization representatives, and the FAA. Our recommendations were targeted for submission in mid-2008. The working group requested, and was granted, an extension of that deadline to December 31, 2008. Our final recommendations were submitted in early December 2008 to the ARAC Executive Committee. The committee accepted our recommendations and the package was moved into the legal and economic analysis phase to followed by creation of an NPRM. During this process, ATEC was provided opportunity for input and several current ATEC board members and ATEC member institution representatives are part of the working group. ATEC provided excellent input and the working group acknowledges their contribution with thanks.

During 2009, several events occurred that have slowed the process of finalizing and publishing the NPRM. The country changed administrations and a new cabinet and head of the FAA had to be confirmed. Several high profile events/accidents occurred that have gotten considerable attention in congress, with hearings and proposed legislation now being acted upon. The FAA has been tasked to immediately respond to these events. Other areas being worked, such as the 147 ARAC, have been placed on a 'hold' status while these immediate safety issues are addressed.

What does this mean? The FAA has a priority system for proposed rule changes and other actions. Priority A items are those with the highest priority and have the shortest timeline for completion or action, i.e. as soon as possible. The Part 147 ARAC is a priority A item. Priority B items are items of interest, but less pressing and typically have a 8-12 year timeline for implementation. The FAA also uses a 'dashboard' that keeps priority items under weekly review for status and action. Being placed on 'hold' means that all available FAA resources are currently placed on items of more immediate importance due to safety or congressional mandate than Part 147. Our status is reviewed weekly and those in the FAA who have to direct available resources know we are sitting there waiting our turn in the queue. Our hold status is not to be taken that the process has been shelved or terminated. Similarly, each of us organize our time at work to take care of the most pressing matters first. We haven't forgotten or canceled the other projects, they simply have to wait until later.

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I wish I was able to provide you with a specific date for the NPRM to be published. That is not possible. However from my discussions with the FAA, our A priority status, and the weekly visibility we receive from FAA leadership, I am fully confident we will see the recommendations move to the NPRM stage as soon as resources are available.

In the meantime, we periodically review our recommendations for improvement. While we wait for the NPRM, the working group would welcome additional review and input from ATEC institutional members. I will, along with several working group members, will be attending your annual conference in Phoenix in April 2010. I will provide an additional update at that time and field any questions or comments you may have. The FAA has placed the full recommendation on their website at the link below in PDF format. We encourage your school to download and review our work.

http://www.faa.gov/regulations_policies/rulemaking/committees/arac/exec_comm/media/EC_AM_T1.pdf

In summary, the Part 147 ARAC is still in process. The FAA is as interested in moving this forward as each of you are. Once any new rules regarding pilot fatigue, safety, and training are complete, I fully anticipate our coming off 'hold' status. Let me caution you however that this may, or may not happen this year. AVS-300, the FAA arm we directly work with, has done everything necessary to move the process forward. Both Mr. Ferrin Moore, and especially Mr. Ed Hall, have spent a tremendous amount of their time working with and for the 147 ARAC working group. Their strong support was critical to our work.

As chair of the Part 147 ARAC working group, I will continue to monitor our status closely. Review the full recommendations and discuss them in your school and with colleagues at the ATEC annual conference. We look forward to hearing from you in Phoenix.

Your patience is appreciated.

Sincerely,

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