



AVS Quality Management System

QPM #
AFS-002-103-F4

Revision
2

Title: AFS Directive and AC Comment Form (Coordination)

Date: 3/12/2015

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OPR/Branch/Routing Symbol
AFS-1/AFS-600

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Document Number/Title
Order 8000.95 CHG 2, Designee Management Policy

Reviewing Organization *(Note: On new content review entire document. On Changes limit review scope to change bar area only)*

Coordination Deadline Date: 10/8/15

Reviewer Use Only

OPR Use Only

Reviewer Name / Routing Symbol / Phone Number	Reviewer Page & Para or Vol., Chap., & Sec.	Reviewer - Comment and Rationale <small>NOTE: If reviewer recommends nonconcur, mark the box to left of comment block and state "Nonconcur" in block below providing specific rationale stated in Order 1320.1 Table B-1, Coordination Responses. Comments will not be considered nonconcur unless approved by the Division Manager. The Division Manger does this by checking the appropriately marked box on the clearance record.</small>	Reviewer Recommended Change <small>Note: If reviewer recommends nonconcur a proposed solution is required from reviewing organization. The OPR will address the comments received by either accepting, rejecting or partially accepting them.</small>	OPR Accept (A) Or Reject (R)	OPR Disposition/Rationale
Aviation Technician Education Council (240) 347-4805	Page 5-12, vol. 5, ch. 2, para. 4(a)(3)(a)	<p>Additional Requirements for DMEs. "Five years' experience actively exercising the privileges of a valid aviation mechanic certificate in accordance with 14 CFR § 65.81 (a) on U.S.-registered civil aircraft. <u>(Three of the five years of experience required must be immediately before designation.)</u>"</p> <p>If applicant has five years' experience actively exercising the privileges the privileges of a mechanic certificate, it is unnecessary for that experience to be immediately before designation.</p>	Strike underlined sentence.		

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Check The Master List To Verify That This Is The Correct Revision Before Use

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Aviation Technician Education Council (240) 347-4805	Page 5-12, vol. 5, ch. 2, para. 4(a)(3)(b)	Additional Requirements for DMEs. “Five years’ experience performing maintenance on U.S.-registered civil aircraft while employed by an FAA repair station (14 CFR part 145). <u>(Three of the five years of experience required must be immediately before designation.)</u> ” If an applicant has five years’ experience performing maintenance while employed by a part 145 repair station, it is unnecessary for that experience to be immediately before designation.	Strike the underlined sentence.		
Aviation Technician Education Council (240) 347-4805	Page 5-12, vol. 5, ch. 2, para. 4(a)(3)(c)	Additional Requirements for DMEs. “Five years’ experience performing maintenance on U.S.-registered civil Air Carrier aircraft operated under (14 CFR parts 121 and 135). <u>(Three of the five years of experience required must be immediately before designation.)</u> ” If an applicant has five years’ experience performing maintenance on aircraft operated under 14 CFR parts 121 or 135, it is unnecessary for that experience to be immediately before designation.	Strike the underlined sentence.		

Aviation Technician
Education Council

(240) 347-4805

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[4\(a\)\(3\)\(d\)](#)

Additional Requirements for DMEs.
“Five years’ continuous experience immediately before designation instructing aviation maintenance while employed by an FAA Aviation Maintenance Technology School (14 CFR part 147). In addition, the applicant must have previously actively exercised the privileges of a valid aviation mechanic certificate in accordance with 14 CFR § 65.81(a) for 3 years on U.S.-registered civil aircraft certificated and maintained in accordance with 14 CFR.”

The underlined sentence can be interpreted to require an AMTS instructor to have actively exercised the privileges of their mechanic certificate for three years immediately preceding appointment. Under this interpretation a part 65 mechanic who exercised the privileges of their certificate for three years, but who has been solely employed for the last ten years as a AMTS instructor, would be ineligible for appointment. This is neither the purpose nor intent of that requirement and could lead to confusion in the field. Please clarify that the three year requirement does not have a specific time frame in which the privileges of the mechanic certificate must be exercised.

Clarify the underlined sentence by adding the following sentences:

“This 3 year requirement need not immediately precede appointment. All that is required is that the applicant has previously exercised the privileges of a valid aviation mechanic certificate for 3 years.”

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DME and DPRE Limitations.
“The DME and DPRE must not:
(11) Conduct an Oral or practical test with
more than one applicant at a time.”

We agree that the oral exam should be
administered to one applicant at a time;
however, the DME *should* be allowed
administer the practical test to two (2)
applicants at a time.

Unlike the oral exam, DMEs can
adequately supervise two practical exams at
a single time and maintain the integrity of
the examination. The significant shortage of
DMEs has created a backlog of students
waiting to take the mechanic’s exam. Until
Order 8900.2 was revised (see Order
8900.2A), DMEs were permitted to test
more than one applicant at a time based
upon a “valid need.” Because there is a
shortage of DMEs and the fact that the
integrity of the practical exam can be
maintained, there is a valid need and
justifiable reason for administering the
practical exam to two applicants at a time.

Strike the underlined portion of the
sentence and add the following sentence:

“The practical test may be administered to
more than one applicant at a time.”

<p>Aviation Technician Education Council (240) 347-4805</p>	<p>Page 5-32-33, vol. 5, ch. 6, para.(2)(c)(1)</p>	<p>Oversight and DMS. “Designee oversight includes the managing, monitoring, and tracking of a designee’s activities and performance. The current edition of FAA Order 1800.56, National Flight Standards Work Program Guidelines, Appendix A, specifically excludes 14 CFR part 183 designated airmen that have surveillance work programs (oversight) developed under DMS. DMS establishes the minimum required oversight activities for each designee based on their authorized activities and risk-based data. Additional oversight may be conducted as deemed necessary by the managing specialist or managing office. Oversight activities are the responsibility of the designee’s managing specialist and the managing specialist is expected to conduct the oversight activities. <u>However, other ASIs can enter oversight activities on the designee, and there are provisions in DMS for the managing specialist to “take credit” for an oversight activity of the same type conducted by another ASI if it’s in the required timeframe.</u> Additional instructions are included in the DMS Job Aids for oversight activities.”</p> <p>The intent of the underlined sentence is to keep the managing specialist in the loop if another ASI is conducting oversight activities without their knowledge. Please clarify this intent.</p>	<p>Strike the underlined sentence and replace with the following:</p> <p>“Other ASIs can enter into oversight activities on the designee, however the ASI must notify the managing specialist of the activities. There are provisions in DMS for the managing specialist to “take credit” for an oversight activity of the same type conducted by another ASI if it’s in the required timeframe.”</p>		