



Aviation Technician Education Council

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Principle Maintenance Inspector
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Orville Wright Bldg. (FOB10A), 5th Floor
FAA National Headquarters
800 Independence Ave., SW
Washington, D.C. 20591

Re: Order 8900.1 changes 390 and 392 and Advisory Circular 147-3B

Dear Jay:

As you know, [FAA Order 8900.1](#), Vol. 2, Ch. 12, [Section 1](#) and [Section 3](#) and [Advisory Circular \(AC\) 147-3B](#) were recently amended. The council would like to provide comment specifically on changes regarding distance education and missed material.

My understanding is that the Order was developed in conjunction with draft AC 147-3B. As you know, the final AC was released on June 5, 2015 with significantly different language than what was included in the draft version. Nevertheless, the draft AC language was utilized in the Order changes referenced above, creating inconsistencies between those two documents.

Most notably, the Order provides guidance that would “limit” distance learning instruction to 400 hours of level 1 instruction. The council maintains, as it did in its [comments to draft AC 147-3B](#), that distance learning instruction should not be limited to hours, rather by the subject matter and material and technology available to ensure the knowledge is properly conveyed.

As you know, that language was removed from the final version of the AC. While it is the council’s understanding that an editorial amendment will be made to remove the provision from the Order as well, ATEC wants to ensure that the Order and AC 147-3B are consistent in all respects. Specifically, its requests that Vol. 2, Ch. 12, Section 1 paragraph 2-1417C be revised to either reference or mirror the language set forth in AC 147-3B, with a few exceptions, noted in red below—

A distance learning program will ensure compliance with all part 147 requirements, including curriculum approval as required by § 147.37. Issuance of OpSpec paragraph A026 is required prior to conducting distance learning. Specifically, an acceptable distance learning program will include written policy and procedures describing—

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1. *How the distance learning program will be administered;*
2. *A description of the examination and testing process;*
3. *Methods for ensuring the integrity of student work and compliance with FAA minimum standards, as listed in part 147 appendices A, B, C, and D;*
4. *Procedures for proctoring computer-based exams in a remote location;*
5. *Procedures to ensure distance learning course records are kept in compliance with the approved curriculum;*
6. *A description of the technology hardware and software to be utilized;*
7. *Proper identification of courses available through distance learning;*
8. *A ~~sophisticated~~ electronic Learning Management System (eLMS) to track all aspects of the distance learning program, including attendance, participation, and performance (including comparisons to traditional classroom test scores and completion rates); and*
9. *FAA “read only” access to the eLMS (to facilitate surveillance).*

Similarly, inspector guidance for implementation of [§ 147.31\(e\)](#), which requires that the AMTS system “show hours of absence allowed and how missed material will be made available to the student,” is not consistent with AC 147-3B or part 147. The Order’s language goes beyond the scope of the regulation, specifically “requiring” that *all* missed projects and assignments be “made up” and the manner in which that must be accomplished.

The council therefore requests that 1) all provision requiring “course makeup” or “makeup procedures” contained in Vol. 2, Ch. 12 be revised such that inspectors are ensuring that *missed material* is made available and 2) that Vol. 2, Ch. 12, Section 1, paragraph 2-1416(A)(6) be revised to either reference or mirror the language set forth in AC 147-3B, with a few exceptions, noted in red below—

Absence and Missed Material. Section 147.31(e) requires an approved system for recording student attendance. The system must show hours of absence allowed and how the missed material will be made available to the student. The system must ensure that all graduates will have completed all appropriate curriculum requirements (see § 147.31(c)).

4. *Instructors shall supervise and verify completion of practical project requirements; other missed materials may be made available through:*
 - a. *Communication of subjects and/or chapters covered in a course textbook;*
 - b. *Availability of an instructor presentation;*
 - c. *Availability of class materials; and/or*
 - d. *Assignments directly attributable to the missed subject matter, such as:*
 - *Supplementary reading assignments;*
 - *Student completion of a written essay;*
 - *Student completion of questions, answers, and references;*
 - *A student oral presentation based on an outline; and/or*
 - *Any other method acceptable to the Administrator.*
- ~~2. All makeup assignments, class assignments, and exams missed in a module must be completed before any written, oral, or practical test can be administered.~~
 - ~~3. Failure of a student to complete all makeup assignments and material within the school’s approved allotted time period may result in the student being required to repeat that subject.~~

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Finally, the council requests that the following AC 147-3B edits (identified above in red) to ensure consistency and to clarify ambiguities in that recently-revised document—

- Remove the word “sophisticated” from the description of the eLMS system in the distance learning section. The word is ambiguous, up for interpretation and un-needed since the section clearly lists the system requirements.
- Add the word “or” to the list of ways that missed materials may be made available to the student to ensure consistency with regulation which only requires that missed materials be made available to the student.
- Remove paragraphs 2 and 3 from the missed material section for the same reason stated above.

Thank you for your consideration of these requests. The council looks forward to working in partnership with the agency to ensure continued refinement of regulations and guidance materials governing AMTS.

Regards,



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Business Manager

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