



Aviation Technician Education Council

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Jay Kitchens  
Branch Manager  
Federal Aviation Administration  
Regulatory Support Division (AFS-600)  
ARB Building, Room 304A  
6500 South MacArthur Boulevard  
Oklahoma City, OK 73169-6918

Re: FAA Order 8900.2A – Revisions to A&P Examination Procedures and DME Appointment

Dear Jay:

Order 8900.2 was recently revised to provide FAA inspectors guidance when enforcing regulations governing the appointment of Designated Mechanic Examiners (DME) and the administration of A&P exams. The Aviation Technician Education Council (ATEC) specifically objects to two revisions: 1) the wholesale prohibition of designees conducting an oral and/or practical (O&P) test of more than one applicant at a time;<sup>1</sup> and 2) the new experience requirements for DME appointments.<sup>2</sup> We ask that you take our objections under advisement and revise Order 8900.2 accordingly.

As you know, ATEC is the principal trade association representing aviation maintenance technician educational institutions including FAA part 147 certificated schools. Many of our members employ DMEs and are directly impacted by these revisions.<sup>3</sup>

The previous order allowed DMEs to test two applicants at a time when there is a “valid need”<sup>4</sup> The removal of this option would create a significant burden on smaller part 147 entities. These schools—most of which are public institutions—give the fifteen-hour O&P test to hundreds of

<sup>1</sup> Fed. Aviation Admin., Order 8900.2A, General Aviation Airman Designee Handbook, ch. 5, ¶ 2(k) (2015). Paragraph 2(k) states that a “designee conducting an oral and/or practical test must not test more than one applicant at a time.”

<sup>2</sup> Order 8900.2A, ch. 6, ¶ 1(a)(3)(d) requires DMEs to have been an AMTS instructor for the past five years and to have concurrently exercised the privileges of a part 65 certificate for three years.

<sup>3</sup> See Letter from Crystal T. Maguire, ATEC Business Manager, to Emily Rogers, Flight Standards Service (Nov. 14, 2014) (discussing association’s comments to Draft Order 8900.2A).

<sup>4</sup> Fed. Aviation Admin., Order 8900.2 CHG 2, General Aviation Airman Designee Handbook, ch. 5, ¶ 2(j), (2013) states:

A designee conducting an oral and/or practical test must not test more than one applicant at a time, unless authorized in his or her COA by the geographically responsible FSDO and in accordance with the procedures and limitations contained in Order 8900.1. **Note:** If you are a Designated Mechanic Examiner (DME) that has a valid need to test two applicants at a time, contact your managing FAA office for consideration.

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students each year. Although it is argued that the computer-generated test questions and projects will reduce the time required to administer each exam, it is unclear if that is true in practice. Moreover, DMEs are typically required to give their local FSDO twenty-four hour notice before a test can be given. That means that a DME must block off sufficient time for each applicant; should that applicant fail, the DME is left with a considerable amount of time that could be used to test someone else. Because the number of exams will double, this will lead to a backlog of students waiting to take the exams. The blanket prohibition against testing more than one applicant fails to recognize that there are certain instances when testing multiple applicants is appropriate and that it can be done without diminishing the quality of the examinations.

Further, Order 8900.2A eviscerates the DME corps by revising the eligibility requirements for an AMTS instructor to be appointed a DME. Under the revised Order, inspector guidance states that AMTS instructors must not only teach the part 147 curriculum for the past five years, but they must also have concurrently exercised the privileges of a part 65 certificate for three years.<sup>5</sup> This additional requirement imposes an unnecessary barrier to entry and prevents some of the most experienced academics from providing examinations because part 147 schools typically prohibit instructors holding outside employment. ATEC members have already felt the burden of this requirement as they struggle to provide enough DMEs to satisfy demand. Unfortunately, this requirement will only create barriers for students who would normally take the O&P test prior to graduating from AMTS.

ATEC is a strong proponent of reforms that would create efficiencies while maintaining the quality of the O&P tests and the persons who administer them. We request that the FAA remove these revisions from Order 8900.2A or, in the alternative, delay the revisions until after fully implementing the randomly-generated testing process. At that time the FAA and industry will be in a better position to determine how to address the growing demand for aviation mechanics and DMEs.

We look forward to the agency's favorable response on this issue and the opportunity to assist with the effective crafting of this order.

Sincerely,



Ryan M. Poteet, Esq.  
Regulatory Affairs Manager

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<sup>5</sup> Fed. Aviation Admin., Order 8900.2A, General Aviation Airman Designee Handbook, ch. 6, ¶ 1(a)(3)(d).