



Aviation Technician Education Council

117 North Henry Street  
Alexandria, VA 22314-2903  
T: 703 548 2030 F: 703 299 0254  
atec@atec-amt.org www.atec-amt.org

January 22, 2016

Delivered by email: [van.l.kerns@faa.gov](mailto:van.l.kerns@faa.gov)

Van Kerns  
Manager, Regulatory Support Division, AFS-600  
Federal Aviation Administration  
Mike Monroney Aeronautical Center  
6500 S. MacArthur Blvd., Rm. 301  
Oklahoma City, OK 73169-6918

RE: Request for deviation from Order 8900.2A DME qualifications

Dear Mr. Kerns:

The Aviation Technician Education Council (ATEC) requests that your office issue a letter to local field offices providing for deviation from current inspector guidance for Designated Mechanic Examiners' (DME) experience requirements. As you know, current requirements are too restrictive and are creating a shortage of DMEs needed to facilitate the issuance of mechanic certificates to new applicants.

Specifically, [Order 8900.2A](#), ch. 6, sec. 1, para. 1(a)(3) sets forth DME experience "requirements":

- Five years experience actively exercising the privileges of a valid aviation mechanic certificate in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part 65, § 65.81(a) on U.S.-registered civil aircraft. Three of the 5 years of experience required must be immediately before designation.
- Five years experience performing maintenance on U.S.-registered civil aircraft while employed by an FAA Repair Station 14 CFR part (145). Three of the 5 years of experience required must be immediately before designation.
- Five years experience performing maintenance on U.S.-registered civil air carrier aircraft operating under 14 CFR part 121 or 135. Three of the 5 years of experience required must be immediately before designation.
- Five years continuous experience immediately before designation instructing aviation maintenance while employed by an FAA Aviation Maintenance Technician School (AMTS) 14 CFR part (147). Also, the applicant must have been concurrently (in addition to the 5 years of experience as an instructor for an AMTS 14 CFR part 147 certificate) and actively exercising the privileges of a valid aviation mechanic certificate in accordance with § 65.81(a) for three years on U.S.-registered civil aircraft (certificated and maintained in accordance with 14 CFR.)

Most troubling for ATEC members is the requirement that aviation maintenance technician schools (AMTS) instructors teach part 147 courses for five years immediately before designation *and* to have "concurrently" exercised the privileges of their mechanic certificate for three of those years by maintaining U.S. registered aircraft. The requirement precludes many of

January 22, 2016

Mr. Van Kerns

Page 2

RE: Request for deviation from Order 8900.2A DME qualifications

the most experienced academics from appointment because of the inability, either due to personal time restrictions, or school policy, to pursue part-time employment while instructing at an AMTS.

Draft [Order 8000.95 CHG 2](#), vol. 5, ch. 2, para. 4(a)(3), which ATEC understands will replace the DME provisions in Order 8900.2A at some point this summer, requires that DME applicants meet one of the following experience requirements:

- 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. (Three of the five years of experience required must be immediately before designation.)
- Five years' experience performing maintenance on U.S.-registered civil aircraft while employed by an FAA repair station (14 CFR part 145). (Three of the five years of experience required must be immediately before designation.)
- Five years' experience performing maintenance on U.S.-registered civil Air Carrier aircraft operated under (14 CFR parts 121 and 135). (Three of the five years of experience required must be immediately before designation.)
- 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.

For AMTS instructors specifically, the revision would ensure that previous experience (as opposed to concurrent experience) provides sufficient qualification.

In [ATEC's comments](#) to draft [Order 8000.95 CHG 2](#), it suggested that the experience qualifications be further modified to remove the requirement that designees have the relevant experience immediately before designation:

- 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.
- Five years' experience performing maintenance on U.S.-registered civil aircraft while employed by an FAA repair station (14 CFR part 145).
- Five years' experience performing maintenance on U.S.-registered civil air carrier aircraft operated under (14 CFR parts 121 and 135).
- 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, three 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.

The council maintains that the "immediacy" requirement creates an undue restriction without providing an increase in safety, and disqualifies many current DMEs and otherwise excellent DME applicants. However, if deemed necessary by the agency, the council requests that inspector guidance be tied directly to similar requirements found in the regulation; specifically, [§](#)

January 22, 2016

Mr. Van Kerns

Page 3

RE: Request for deviation from Order 8900.2A DME qualifications

[65.83](#). Under that regulation, an AMTS instructor may satisfy recent experience requirements so long as the administrator deems that person “able to do that work” (see [§ 65.83\(a\)](#)).

The council therefore requests a memorandum to field offices notifying inspectors to deviate from current language in Order 8900.2A CHG 1, ch. 6, sec. 1, para. 1, as follows:

- 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 and meeting the recent experience requirements provided for in [§ 65.83](#).
- Five years’ experience performing maintenance on U.S.-registered civil aircraft while employed by an FAA repair station (14 CFR part 145) and meeting the recent experience requirements provided for in 14 CFR [§ 65.83](#).
- Five years’ experience performing maintenance on U.S.-registered civil air carrier aircraft operated under (14 CFR parts 121 and 135) and meeting the recent experience requirements provided for in [§ 65.83](#).
- Five years’ experience, with six months being in the previous 24 months, instructing aviation maintenance while employed by an FAA Aviation Maintenance Technology School (14 CFR part 147). In addition, three 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 and meeting the recent experience requirements provided for in 14 CFR [§ 65.83](#).

We appreciate your willingness to work with industry on this important issue and look forward to your response.

Sincerely,



Crystal Maguire  
Business Manager

cc: Jay Kitchens, Branch Manager, AFS-650  
Ryan Goertzen, President, ATEC  
Gary Hoyle, Treasurer, ATEC