

Aviation Technician Education Council and Federal Aviation Administration

Summary of Oral Communications re Part 147

Friday, Sept. 9, 2016 10:30 AM-12:00 PM

FAA officials and aviation maintenance technician school (AMTS) representatives gathered at the Aviation Technician Education Council (ATEC) annual Washington Fly-in. The meeting was held at the Helicopter Association International headquarters in Alexandria, Virginia. Attendees included:

- Tim Shaver, Manager, Aircraft Maintenance Division, FAA
- Rolandos Lazaris, Deputy Assistant Manager, Aircraft Maintenance Division
- Kevin Morgan, Supervisory Aviation Safety Inspector, FAA
- Robert Warren, Aviation Safety Inspector, FAA
- Butch Adams, Campus Director, Pittsburgh Institute of Aeronautics - Hagerstown
- Ronald Donner, Chief Editor, AMT Magazine
- Fred Dyen, Vice President, Blue Ridge Community College
- Joseph Garcia, Aviation Maintenance Instructor, Lively Technical Center
- Ryan Goertzen, Chief Aviation and Academic Officer, Spartan College of Aeronautics & Technology
- Donald Gregson, Senior Vice President of University Operations, Hallmark University
- Brad Hanselman, Director, Tulsa Technology Center
- Gary Hoyle, Director of Campus Operations, Pittsburgh Institute of Aeronautics - Youngstown
- Darrell Irby, DP Chairperson, Tarrant County College
- Jocelyn Irby, Lawyer/Partner, The Irby Law Firm
- Amy Kienast, Director of Career Services, MIAT College of Technology
- Michael Mackey, Manager, TechOps Training, Delta Air Lines, Inc.
- Crystal Maguire, Executive Director, Aviation Technician Education Council
- Dennis Manzo, President, Spartan College of Aeronautics & Technology - Los Angeles
- Sheryl Oxley, Aviation Program Coordinator, Tulsa Technology Center
- Kim Pritchard, Sr. Mgr. Technician Recruitment, United Airlines
- Andrew Smith, Associate Professor, Kansas State University - Salina
- Art Spengler, Vice President, Premier Aircraft Sales, Inc.
- Donald Stark, Airframe & Powerplant Coordinator, Sinclair Community College
- Harold Summers, Director, Flight Operations & Technical Services, Helicopter Association International

The purpose of the “listening session” was for industry to provide feedback and voice concerns on regulatory matters surrounding governance of AMTS through 14 Code of Federal Regulations part 147. Issue presented included encouragement of AMTS and high school partnerships, availability and bandwidth of designated mechanic examiners and the benefits and challenges associated with a part 147 regulation that would allow AMTS to develop competency-based programs. Given that part 147 is currently in rulemaking, the agency requested that this summary be made available for public inspection.

Roundtable participants spoke on the benefits and limitations of a rule that would allow AMTS to develop competency-based programs, whereby the agency sets the testing standards and provides AMTS the opportunity to meet those standards free from prescriptive requirements (seat time, subject requirements, etc.).

Specifically, AMTS representatives requested that the final rule be issued without language that would require a specific number of program hours. Participants pointed out that competency-based systems

are widely-supported by the education community including the Department of Education, and are proven to provide efficient and effective educational programs for the future workforce. Removing prescriptive requirements from the proposed rule would also be in line with the agency's efforts to implement risk-based oversight. That is, given the low-risk associated with AMTS, FAA resources currently utilized to enforce regulatory requirements such as grading systems, seat time, availability of missed material, etc. could be better utilized in higher risk areas (air carrier oversight, etc.). Further, AMTS operations and the manner in which it educates its students are better overseen by Department of Education and accreditors.

Industry representatives also addressed potential concern in the local inspector's ability to enforce a competency-based rule, and measure the effectiveness of its program. AMTS representatives pointed out that the current rule does not provide the framework to measure program effectiveness (i.e., inspector checklists are focused on attendance records and grading policies), and that the AMTS "effectiveness" would ultimately be measured through the mechanic test standards, which the FAA controls. Ultimately, the agency will only issue a mechanic certificate to those applicants that possess the requisite skill and knowledge, as provided for in the written, oral and practical tests set forth by the agency.

Industry representatives also addressed the development of new airman certification standards (ACS) and how those standards should be utilized in the final rule. Once the ACS is developed, the standards could be incorporated into an AMTS operations specifications, to include specific objectives and teaching levels as needed. That way the AMTS would be "required" (through op specs) to teach those items provided for in the mechanic test.

In closing, industry asked the agency to duly consider the benefits of allowing AMTS to implement modern educational systems that other industries have long utilized. They asked agency representatives to permit programs that transition away from seat time in favor of a structure that creates flexibility, and allows students to progress as they demonstrate mastery of subject matter, regardless of time, place, or pace of learning. This type of rule would encourage free-flow of A&P mechanic applicants to an industry that desperately needs a competent and qualified workforce to support continued operations.