



Aviation Technician Education Council

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Delivered by email: kevin.morgan@faa.gov

Mr. Kevin Morgan
Supervisory Aviation Safety Inspector
Federal Aviation Administration
800 Independence Ave SW
Washington DC 20591-0001

Re: Additional fixed locations for part 147

Aviation maintenance technician schools (AMTS) certificated under Title 14 Code of Federal Regulations (CFR)¹ part 147 are facing unprecedented demand for graduates of their airframe & powerplant (A&P) programs. To meet the growing need for technicians and A&P mechanics,² these institutions are seeking opportunities to increase their enrollment. One method proven successful is dual enrollment programs whereby AMTS provide course instruction at local high schools, allowing students to earn credit towards an A&P program.

The current regulation does not prohibit AMTS from providing courses at another location; nevertheless, flight standards district office (FSDO) opinion on programs allowable under the regulation varies considerably, with some expressly forbidding the practice.³ Local office personnel that prohibit dual enrollment generally cite language in FAA Advisory Circular 147-3B, which states that an AMTS “may not operate as a satellite facility” and that “all AMTS must be FAA-certificated as separate facilities.”⁴

Notwithstanding the fact that an AC cannot impose requirements or prohibitions, the utilization of satellite facilities for AMTS, without clearly defined protocols, is discouraged. The concept is utilized differently amongst air agencies (i.e., part 141, 142 and 145 certificate holders) and therefore largely misunderstood. If applied as provided for in [§145.107](#), it would offer little in the way of efficiencies and preclude most non-AMTS institutions from participating in dual enrollment programs since that regulation requires repair station satellites to apply for and maintain their own, separate FAA certificate.

¹ All regulatory references are to Title 14 CFR unless otherwise indicated

² See Boeing report predicting future demand, available at <http://www.boeing.com/commercial/market/long-term-market/pilot-and-technician-outlook/#/economic-expansion>, and Oliver Wyman forecasts that demand will soon outstrip supply: <http://www.oliverwyman.com/content/oliver-wyman/ow-v2/en/our-expertise/insights/2017/apr/mro-survey-2017.html>

³ See Richmond FSDO [letter denying](#) dual enrollment program approval, stating that “there are no provisions in Part 147 to allow a certificated school to have any type of satellite facility. As a matter of fact, Advisory Circular 147-3A, Certification and Operation of Aviation Maintenance Technician Schools, Chapter 2, paragraph 16, specifically addresses this issue...”

⁴ See [AC 147-3B](#), Certification and Operation of Aviation Maintenance Technician Schools

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Re: Additional fixed locations for part 147

If the agency intends to utilize satellites in the manner provided for in part 141 and 142, ATEC asks that the term be clearly defined and the guidance material updated to ensure inspectors—that most often have a background in part 145 enforcement—have clear direction that ensures AMTS can utilize satellite locations in an efficient and practical manner.

Alternatively, ATEC suggests utilizing current operations specifications (OpSpecs) standard templates⁵ to introduce additional fixed locations—OpSpecs paragraph A101—and course work provided at those locations—OpSpecs paragraph D100. Keeping in line with standard practice for other air agencies that hold OpSpecs (as opposed to training specifications), the additional locations would be under the control of the AMTS primary location and subject to FAA oversight.

Thanks for allowing us the opportunity to weigh in on this important issue. ATEC is standing by to support in whatever manner required.

Sincerely,



Crystal Maguire
Executive Director

cc: robert.w.warren@faa.gov

⁵ See OpSpecs standard templates, defined in the Flight Standards Information Management System (FSIMS), Order 8900.1, Volume 3, Chapter 18, Section 1, available at <http://fsims.faa.gov/PICDetail.aspx?docId=8900.1,Vol.3,Ch18,Sec1>