



P.O. BOX 234
JENKS, OK 74037

703.548.2030
ATEC@ATEC-AMT.ORG
ATEC-AMT.ORG

September 29, 2020

Mr. Ricardo Domingo
Executive Director, Flight Standards Service
Federal Aviation Administration
800 Independence Ave SW
Washington DC 20591-0001

Sent via Email: rick.domingo@faa.gov

Re: Distance Learning for Light Sport Repairman Training

Dear Rick,

Aviation maintenance technician schools (AMTS) certificated under Title 14 Code of Federal Regulations (CFR) part 147 provide valuable aviation maintenance training, beyond the subject areas listed in part 147. For example, Light Sport Repairman Training, approved through the Specialty Aircraft Examiner Branch, is a course that part 147 schools are uniquely qualified to offer. Unfortunately, part 147 schools who are otherwise approved to offer part 147 content via distance learning have thus far been unsuccessful in their efforts to provide Light Sport Repairman Training through that same content delivery system.

It is our understanding that the Specialty Aircraft Examiner Branch will not approve a remote Light Sport Repairman Training course because inspector guidance (i.e., Order 8000.84B) does not include provisions for evaluating courses that will be offered via distance learning.

Absence of inspector guidance should not result in the imposition of prohibitions, especially in this case where a part 147 distance learning program has already undergone FAA scrutiny and approval. As you know, part 147 distance learning authorization is provided through inclusion of paragraph A026 in an aviation technician training school's operations specification. That authorization is based on a local office's review of the policies and procedures in place for remote learning and has little to do with the content offered. It is the association's position that if the Light Sport Repairman Training course content has already been approved (here through the Specialty Aircraft Examiner Branch) then the method of delivery (i.e., distance learning) should not necessitate separate scrutiny.

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RE: Distance Learning for Light Sport Repairman Training

We therefore ask that your office confirm that the Specialty Aircraft Examiner Branch may rely on a part 147 school's distance learning authorization, as evidenced in its operations specifications, when approving a Light Sport Repairman Training course intended to be offered remotely.

Thank you in advance for the speedy resolution to this matter,



Crystal Maguire
Executive Director

cc: lawrence.fields@faa.gov
van.l.kerns@faa.gov
bruce.decleene@faa.gov
Tim.Shaver@faa.gov
Jackie.L.Black@faa.gov
Edsel.Ford@faa.gov
catherine.m.lang@faa.gov
Ken.Bain@faa.gov
DyenF@brcc.edu