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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: Additional Fixed Locations for Part 147

Dear Rick:

Aviation maintenance technician schools (AMTS) certificated under Title 14 Code of Federal Regulations (CFR) part 147 are looking for innovative ways to meet industry demand for aviation mechanics. One increasingly popular method is the development of high school dual enrollment programs. Unfortunately, the current regulatory structure does not create a clear pathway for what would otherwise be a very simple solution for many schools looking to expand their reach.

While several school systems have successful high school partnership programs, the manner in which they are created and implemented varies considerably. Put simply, AMTS are largely prohibited from enrolling high school students in their programs when AMTS content is provided at the high school (i.e., away from the AMTS primary location).

While the current regulation does not prohibit AMTS from providing courses at another location, the regulatory framework does not facilitate FAA oversight of content provided away from the AMTS primary location. Further, FAA Advisory Circular 147-3B expressly states that an AMTS “may not operate as a satellite facility” and that “all AMTS must be FAA-certificated as separate facilities.” Notwithstanding the fact that an AC cannot impose requirements or prohibitions, the guidance makes it very difficult for an AMTS to develop direct enrollment opportunities *at* local high schools.

While the council appreciates the agency’s recognition of the problem in its recent [part 147 supplemental notice of proposed rulemaking](#), and that it proffers a solution in the form of “satellite facilities,” ATEC does not believe the proposed regulatory language will meet the intended objective. The concept of “satellite” is utilized differently amongst air agencies (i.e., part 141, 142 and 145 certificate holders) and is therefore largely misunderstood. As further explained in [ATEC’s comments to the part 147 SNPRM](#), the FAA proposal to introduce “satellite facilities” for part 147 is overly cumbersome and creates a new set of approvals that will dissuade most AMTS from utilizing the solution.

ATEC instead proposes—as it did in a [memo sent to the agency on May 18, 2017](#)—that the agency adopt a system consistent with part 145 repair station operations, a concept familiar to local inspectors and

many AMTS administrators. The council recommends that the agency utilize operations specifications templates for paragraphs A101 and D100 for part 147 certificate holders. This simple solution would use infrastructure already in place to allow schools to provide content away from its primary location and subject to FAA oversight.

While ATEC recommended specific regulatory language in its part 147 SNPRM comments to ensure that additional fixed locations are subject to all part 147 requirements, the current regulation does not prohibit the agency's adoption of ATEC's proposed solution prior to rule change. (Indeed, part 145 certificate holders utilize additional fixed locations without reference to that "privilege" in 14 CFR part 145.) ATEC therefore recommends that the agency expand access to the referenced operations specifications paragraphs as soon as possible.

ATEC also understands that the proposal would necessitate revision to Order 8900.1. The council suggests that inspector guidance mirror the direction provided to inspectors with part 145 repair station oversight. We stand ready to assist in that effort as needed.

We look forward to further discussing the issue with FAA representatives at the upcoming ATEC Fly-in on Sept. 11. Thank you in advance for your attention to this important matter.



Crystal Maguire
Executive Director

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