

October 26, 2015

**FILED ELECTRONICALLY**

Docket Operations, M-30  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Room W12-140  
West Building Ground Floor  
Washington, DC 20590-0001

RE: Comment Extension Request  
Notice of Proposed Rulemaking, Aviation Maintenance Technician Schools  
Docket No. FAA-2015-3901; RIN 2120-AK48

To Whom It May Concern:

The undersigned organizations respectfully request a ninety (90) day extension of the comment period for the above referenced rulemaking.

As you know, the notice of proposed rulemaking (NPRM) sets forth a significant revision to Title 14 Code of Federal Regulations (CFR) part 147, the regulation governing the operation of, and required curriculum for, FAA-certificated aviation maintenance technician schools (AMTS).

Static curriculum requirements in the current part 147 do not support industry needs. AMTS lack the flexibility to teach the skills required to work on modern aircraft, forcing schools to stretch resources and industry to bear additional costs to ensure graduates are capable of completing the basic tasks required to maintain state-of-the-art, technically sophisticated equipment.

A final rule revising the process by which AMTS educate future aviation mechanics impacts not only the hundreds of institutions that educate our workforce, but also the thousands of businesses that rely on AMTS graduates to keep aircraft in flight. With the additional time requested, the aviation industry and its partners in technical education will help the agency develop a rule that supports schools, aids students at the beginning of a rewarding career and serves an important and growing industry.

We look forward to the agency's favorable response on this issue and the enhanced opportunity to provide comprehensive and meaningful comments to the NPRM.

Sincerely,

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