

May 9, 2018

The Honorable Orrin G. Hatch
U.S. Senate
Washington, D.C. 20510

The Honorable Maria Cantwell
U.S. Senate
Washington, D.C. 20510

The Honorable Richard Blumenthal
U.S. Senate
Washington, D.C. 20510

The Honorable Jim Inhofe
U.S. Senate
Washington, D.C. 20510

Re: Modernizing Training Programs at Aviation Maintenance Technician Schools

Dear Senators Hatch and Cantwell:

Federal Aviation Administration (FAA) regulations dictate what educational institutions teach aspiring aviation maintenance mechanics. Unfortunately, those static curriculum requirements have not been updated in more than five decades. In an age where technological advances are constantly driving innovation for safer and more efficient aircraft, schools are *mandated* to teach antiquated and inconsequential subject areas. Seeing no regulatory relief is in sight, the undersigned organizations strongly support your legislation requiring the agency to modernize aviation maintenance technician training.

Title 14 Code of Federal Regulations (CFR) part 147 – the regulation governing aviation maintenance technician schools – was originally established under the Civil Aviation Administration and re-codified into 14 CFR in 1962. Since that time, neither the regulation, nor the subject areas it dictates be taught, have significantly changed.

During the same time, the design regulations mandating the standards to which a civil aviation article must be certificated and maintained have changed innumerable times. These revisions have enhanced safety significantly; they also mandate more sophistication and knowledge in maintenance personnel.

For decades, industry has paid for the resulting skills gap, forced to retrain new graduates to ensure they can complete basic tasks required to maintain modern, sophisticated aircraft. Given the imminent shortage of qualified mechanics, we must resolve this compromise in quality.

The aviation maintenance community has long-awaited an update to part 147 curriculum requirements. Over the last ten years, industry representatives have provided specific recommendations through a 2007 Aviation Rulemaking Advisory Committee, made substantive comment to the 2015 notice of proposed rulemaking, responded to agency requests for additional information through submission of supplemental comments and facilitation of surveys, and participated in working groups to improve mechanic testing standards and correlated training programs.

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While industry will continue to lend support, and appreciates the time and effort required for well thought out and monitored rulemaking, it cannot afford to sit by and wait for regulatory relief.

We appreciate your leadership in this area and stand by to support your efforts as needed.

Sincerely,

Aeronautical Repair Station Association
Aerospace Industries Association
Aerospace Maintenance Council
Aircraft Electronics Association
Aircraft Mechanics Fraternal Association
Airlines for America
Association for Women in Aviation Maintenance
Aviation Maintenance Technician Association
Aviation Suppliers Association
Aviation Technician Education Council
Cargo Airline Association
General Aviation Manufacturers Association
Helicopter Association International
International Air Transport Association
Modification and Replacement Parts Association
National Air Carrier Association
National Air Transportation Association
National Business Aviation Association, Inc.
Professional Aviation Maintenance Association
Regional Airline Association
Women in Aviation International