

February 22, 2016

SENT VIA EMAIL: Robert.W.Warren@faa.gov

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: Comments to Notice of Proposed Rulemaking, Aviation Maintenance Technician Schools; Docket No. FAA-2015-3901; RIN 2120-AK48

To Whom It May Concern:

The STEM Education Coalition respectfully submits comments in response to the notice of proposed rulemaking (NPRM) for Title 14 Code of Federal Regulations (CFR) part 147, the regulation governing the operation of FAA-certificated aviation maintenance technician schools (AMTS).

As an alliance of more than 600 education, business, and professional organizations, our Coalition is strongly committed to the goal of elevating the education of all students in the STEM subjects as a national priority as reflected through federal education laws, policies to drive innovation, and federal and state spending priorities. We also seek to expand the capacity and diversity of the STEM workforce pipeline and ensure student success in technical fields. As aviation is one of the nation's most STEM-rich industries, it is imperative that the FAA revise outdated curriculum requirements that fail to adequately prepare students for aircraft maintenance technician jobs.

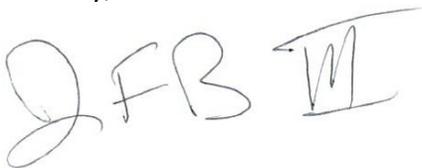
While the NPRM includes needed revisions, we are concerned that the FAA has exceeded its basic mandate to oversee and regulate safety in the aviation industry. The proposal does nothing to limit the agency's incursion into education oversight, a responsibility best left to other executive branch agencies.

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Our Coalition supports education policies that are flexible and responsive to the needs of the global economy. As proposed in the NPRM, FAA mandates on teaching times, passing norms, maximum levels of instruction, student/teacher ratios, and static curriculum topics are not hallmarks of a modern, competency-based structure that industry desperately needs. These requirements lead to waste and increased costs for industry and students pursuing a STEM education.

We ask that the agency's final rule supports a competency-based learning system that allows industry to freely meet already-mandated knowledge, skill and experience standards and fully support the recommendations made by the Aviation Technician Education Council – the association dedicated to serving AMTS – in its independent comments.

Sincerely,

A handwritten signature in black ink, appearing to read "JFB" followed by a stylized monogram or flourish.

James Brown
Executive Director