

February 1, 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: Comments to 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 submit these 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).

While the proposal includes several beneficial changes, there is considerable room for improvement. Industry desperately needs competency-based guidelines that allow institutions to design programs that match industry and safety needs. The proposal does not provide such a framework; rather, it maintains directives from the current rule that fly in the face of a competency-based system.

Mandating teaching times, dictating passing norms, requiring government approval to teach beyond set levels of instruction, imposing student/teacher ratios, demanding approval of instructor rosters, and requiring rigid adherence to static curriculum topics are not hallmarks of a modern, competency-based system. These requirements in the current part 147 – old and inadequate as they are – have led to waste and increased costs for the AMTS community and industry.

Put simply, the proposal would impose 20th century educational practices on a 21st century industry. It maintains its predecessor's antiquated concern with the time a student spends in a classroom seat rather than focusing on the skills he or she actually gains. A competency-based standard, free of defined schedules and specific hour requirements, will allow industry to transition away from seat time in favor of a structure that creates flexibility and allows students to progress as they demonstrate mastery of subject matter, regardless of time, place, or pace of learning.

Fixing 147 is an industry imperative. Handicapping our schools burdens both graduates and employers – imposing costs on the entire aviation community. Industry cannot afford another fifty years of governance by an outdated and static rule. Give us the

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flexible and dynamic rule needed to ensure we can educate the future workforce by the best means necessary.

We look forward to working with the agency under new guidelines that will support aviation maintenance technician education for years to come.

Sincerely,

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