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November 8, 2007

VIA E-MAIL TO: jim.ballough@faa.gov

Mr. James Ballough
Director, Flight Standards Service
Federal Aviation Administration
800 Independence Avenue SW
Washington, D.C. 20591-0004

RE: Requested Clarification/Change to Advisory Circular (AC) 65-25(D): Aviation Maintenance Technician Awards Program

Dear Mr. Ballough:

The Aeronautical Repair Station Association requests your assistance in clarifying an issue relating to the above referenced document. Ultimately, the Association would like to see a change to that AC to further encourage "employees and employers to participate aggressively in...initial and recurrent maintenance training".

Specifically, ARSA members have questioned the extent of a repair station's options in earning credit hours under the "FAA Training Seminar" section of AC 65-25D found at paragraph (4b):

FAA Training Seminar. A seminar of at least 50 minutes constitutes 1 training hour. The seminar must cover FAA maintenance or airworthiness regulations and related policy and be conducted by FAA personnel or by persons acceptable to the FAA. Persons acceptable to the FAA are: properly trained and current FAA aviation safety inspectors, FAA Safety Team Program Managers, mechanics with Inspection Authorizations, and Title 14 of the Code of Federal Regulations (14 CFR) part 147 instructors. FAA training seminars lasting at least 50 minutes may be combined to meet the 2-hour requirement of the desired award. FAA courses on regulations and policies that exceed 2 hours are considered credible training for all awards. (Emphasis added.)

The "FAA Training Seminar" requisite, under the AMT Awards Program, credits a repair station and its employees for completion of courses covering "FAA maintenance or regulations and related policy." Additionally, the "seminar" must be conducted by FAA personnel or by persons acceptable to the FAA."

Currently, repair stations develop and provide courses, under approved training programs, which include instruction on compliance with the repair station's quality manual, proper completion of maintenance records, supervisor and inspector requirements and similar 14 CFR regulatory and policy subjects.

Unfortunately, the individuals that conduct the training for a repair station may not be one of the "persons" currently listed in the referenced paragraph. In other words, the

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individual may not be an FAA aviation safety inspector, FAA Safety Team Program Manager, mechanic with Inspection Authorization, or 14 CFR part 147 instructor. Rather, they will be managers, supervisors, inspectors or technicians working under the auspices of 14 CFR part 145, which requires all persons to be properly qualified (see, Subpart D—Personnel of part 145). Additionally, each repair station must have an FAA approved program that ensures persons are capable of performing assigned tasks (see 14 CFR section 145.163(b)).

Therefore, ARSA requests the FAA officially acknowledge that regulatory compliance training courses developed and provided under 14 CFR part 145 approved training programs are conducted by “persons acceptable to the FAA.” This may be accomplished quickly by issuing a letter to the Association, but ultimately, we suggest the referenced paragraph be changed to:

Persons acceptable to the FAA are: properly trained and current FAA aviation safety inspectors, FAA Safety Team Program Managers, mechanics with Inspection Authorizations, individuals providing training under programs approved in accordance with Title 14 of the Code of Federal Regulations (14 CFR) part 145 and part 147 instructors.

This clarification will encourage repair stations to develop and use more regulatory compliance training. The ability to use such training as credit hours will in turn encourage the use of the FAA AMT Awards program by employers for individual technicians. This is clearly in harmony with the purpose of that program as well as 14 CFR part 145.

ARSA looks forward to the FAA’s response.

Your Servant,

A handwritten signature in blue ink that reads "Sarah MacLeod". The signature is fluid and cursive, with the first name "Sarah" being the most prominent part.

Sarah MacLeod
Executive Director

cc: Phillip Randall, AFS-8A

prandall@triad.rr.com