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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 on petition for exemption by Southern Utah University
Docket Number: FAA-2018-0215

To whom it may concern,

The Aeronautical Repair Station Association (ARSA) submits these comments in support of Southern Utah University's (SUU) request for exemption from the curriculum requirements of [Title 14 Code of Federal Regulations \(CFR\) § 147.21\(a\)-\(c\)](#).

SUU seeks to develop a program using its existing credit hour system to administer the emerging Aviation Maintenance Technician (AMT) Airman Certification Standards (ACS) as the basis for its airframe and powerplant (A&P) curriculum.

In light of the agency's continuing work on both the ACS and its effort to re-write [part 147](#) – the first substantive overhaul of the AMT school rule in more than 40 years – granting this petition would provide a means to examine the effectiveness of both. The FAA can gather insight as to how an independent program prepares aspiring mechanics for the necessary written, oral and practical testing required for airman certification.

Though not described in the petitioner's submission, it is these testing standards and their use in coordination with the ACS that ensure an equivalent level of safety in acceptance of the petition. Completion of the curriculum defined by [part 147 appendices A-D](#) merely provides an applicant with the experience required by [§ 65.77](#) for aircraft mechanics. Only after demonstrating the necessary knowledge ([§ 65.75](#)) and skill ([§ 65.79](#)) can an AMT school graduate earn an airman's certificate under [part 65 subpart D](#). Once earned, the certificate depends on the holder's active exercise of its privileges ([§ 65.83](#)). In short, the regulatory system provides a layered structure of requirements for an individual to gain and maintain authority to perform and approve work for return to service – the FAA possesses multiple points of oversight through which to ensure safety.

The agency should rely on the robustness of its system for airman certification and consider the SUU petition as a tool in promoting aviation maintenance workforce development. As noted by the petitioner: "Industry wastes time and resources educating

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recent technician-school graduates on basic, accepted technologies that could and should be learned in the classroom.” Data collected by ARSA through a [2017 web survey](#) indicates that repair stations need an average of nine months of onboarding to make a new A&P into an independent, profitable mechanic, with a number of respondents reporting vastly longer lag times. Allowing schools to teach new and evolving aviation technologies will better prepare students to enter a modern workforce.

During this time of expansion for aviation markets worldwide, maintenance organizations indicate that finding and retaining technical talent [has become one of the most pressing challenges facing the industry](#). To address this situation in terms of the need to ensure airworthiness across expanding fleets of civil aircraft, the FAA should take advantage of any opportunity to support improvement in AMT education.

Considering the foregoing and the information provided with SUU's petition, the association encourages the agency to grant the requested exemption.

Sincerely,



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