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January 19, 2017

Submitted to: <http://www.regulations.gov>

U.S. Department of Transportation
Docket Operations
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: Petition for Exemption from 14 CFR § 147.21

To Whom It May Concern:

This petition for exemption is filed pursuant to Title 14 Code of Federal Regulations (CFR)¹ part 11.²

The undersigned, a non-profit organization, respectfully submits this petition for exemption on behalf of aviation maintenance technician schools (AMTS) certificated under part 147. The council seeks relief from curriculum requirements provided for in § 147.21 such that AMTS may provide students credit for time spent preparing for and competing in the Aerospace Maintenance Competition (AMC).

Specific Sections from which Exemption is Sought³

Section 147.21 sets forth general curriculum requirements for AMTS mechanic programs. The regulation mandates that AMTS offer a defined number of hours of instruction in very specific subject areas, as outlined in the rule's appendices.

Reason and Extent of Relief Sought⁴

The AMC provides an opportunity for students to receive valuable, practical experience in aviation maintenance. The council believes the knowledge imparted to student participants is equivalent, if not more valuable, than that received through traditional education in an AMTS. The current part 147 does not include a provision for making equivalency determinations, it therefore discourages student participation in programs such as the AMC since the time spent preparing for and participating in the competition cannot be utilized to satisfy curriculum

¹ All regulatory references are to 14 CFR unless otherwise indicated.

² See §§ [11.61\(b\)](#), [11.63](#) and [11.81](#).

³ See § [11.81\(b\)](#).

⁴ See § [11.81\(c\)](#).

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requirements. Further, the regulation is often interpreted by local inspectors to require that the classroom time missed while participating in the competition (a three-day event) be “made up”, creating an even bigger disincentive for schools to encourage its students to participate.

Under the exemption, schools would have established procedures to determine the time spent preparing for and attending the competition, and therefore the amount of credit each student may earn through their participation.

Why Granting the Relief is in the Public Interest⁵

Allowing AMTS to provide students credit for participating in the competition would encourage practical training, better preparing them for careers in aviation maintenance. The student population benefits from the experience, schools would be relieved of the economic burden of requiring students to “make up” time away from class to attend the competition, and the public as a whole gains a more qualified entering workforce.

Why Granting the Relief does not Adversely Affect Safety⁶

The scope and content of required curriculum will not change. Students must still possess the requisite knowledge and skill to pass the A&P mechanic test, the exemption would just encourage another way for schools to impart that knowledge, outside of the classroom. The FAA has acknowledged the equivalent level of safety, and granted such relief to similarly-situated institutions.⁷

Summary to be Published in the *Federal Register*⁸

The Aerospace Maintenance Council petitioned for an exemption, seeking relief from curriculum requirements provided for in § 147.21, such that AMTS may provide students credit for time spent preparing for and competing in the Aerospace Maintenance Competition.

Thank you for considering this request,

Sincerely,

John Goglia
President

⁵ See § [11.81\(d\)](#).

⁶ See § [11.81\(e\)](#).

⁷ See, e.g. FAA exemption no 7772.

⁸ See § [11.81\(f\)](#).