The New Part 147: A Comprehensive Update from FAA Safety Standards

Presented To: 2024 ATEC Annual

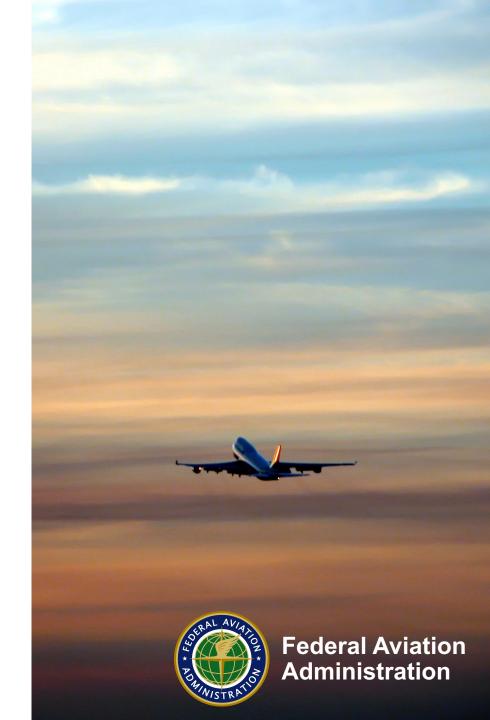
Conference

By: FAA Flight Standards Service, Aircraft

Maintenance Division, Airmen Group

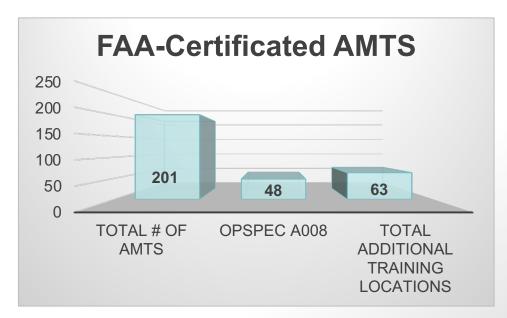
Date: Tuesday, March 19, 2024

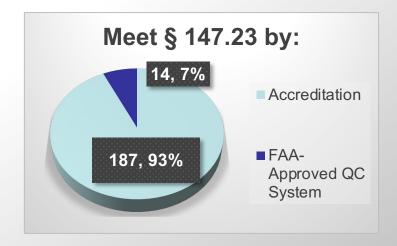
Breakout #9: 9:30 - 10:30



FAA Certificated AMTS

- September 21, 2022 New regulations effective
- AMTS stats (as of 2/26/2024)



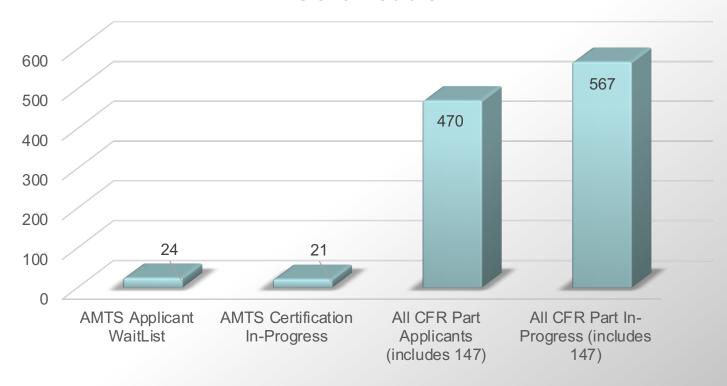


- No AMTS located outside the US
- No additional training locations outside of the US

AMTS Certification

45 potential new AMTS (as of 2/26/2024)

Certification



AMTS Training Data

§ 147.17(a) Training requirements

- (a) Each certificated aviation maintenance technician school must:
 - (1) Establish, maintain, and utilize a curriculum that is designed to continually align with the mechanic airman certification standards referenced in paragraph (b) of this section, as appropriate for the ratings held;
 - (2) Provide training of a quality that meets the requirements of § 147.25; and
 - (3) Ensure students have the knowledge and skills necessary to be prepared to test for a mechanic certificate and associated ratings under subpart D of part 65 of this chapter.

- 147.25 Pass Rate report single report showing pass rate of each AMTS
- 147.17 Quality of Instruction reports Various reports based on FAA test results

AMTS Training Data

§ 147.17(a) Training requirements

- (a) Each certificated aviation maintenance technician school must:
 - (1) Establish, maintain, and utilize a curriculum that is designed to continually align with the mechanic airman certification standards referenced in paragraph (b) of this section, as appropriate for the ratings held;
 - (2) Provide training of a quality that meets the requirements of § 147.25; and
 - (3) Ensure students have the knowledge and skills necessary to be prepared to test for a mechanic certificate and associated ratings under subpart D of part 65 of this chapter.

Pass Rate Report (147.17(a)(2), 147.25)

- Single report, single data point per AMTS
- Based on the parameters in 147.25:
 - 60 days after graduation
 - All tests taken (written, oral, practical)
 - For the last 3 years
- A pass rate <u>under</u> 70% does not meet part 147 training requirements

Quality of Instruction Reports (§ 147.17(a)(3))

- Various Reports:
 - Reports by section, subject area, 147.31 and 65.80 tests, etc
 - Data: within 30 days/60 days of graduation
 - Data based on: "first test' attempt, retests, other



Early Testing

- "early" refers the student not being graduated
- § 65.80 "early" oral and practical
 - Prior to graduation and completion of written tests
 - If student completes O & P prior to graduation, all that's left to take are the written tests.
- § 65.75(c) + 147.31, "early" general written
 - Written test only
 - Does not extend to general oral or practical tests

Early Testing FAQ

- Will early testing affect my 147.25 pass rate? NO
 - Early testing will not negatively affect pass rate
 - Pass rate only includes data from <u>after</u> graduation; early tests are all <u>prior to</u> graduation.
 - Once the student graduates, only the remaining tests (e.g., written tests if testing under 65.80) are used in the pass rate calculation
- Can I take general O&P as soon as I pass my general written test? NO
 - Must either graduate or test under 65.80 to take the general oral/practical (see 65.75(b)



Part 147 Guidance Updates

Guidance changes

- 8900.1 minor editorial updates
- Changes to certification process
 - Applicants not added to waitlist until all documents for formal application are submitted
 - Once FAA resources assigned, FAA begins design assessment (document review)
- Removing A025 OpSpec (in the next few months)
 - Once removed from webopss, CH's can use electronic records, manuals, signatures without opspec issuance/FAA approval.
- AC 147-3 edits to align (with above) will follow the guidance changes above

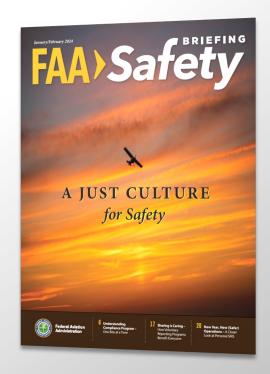


Part 147 Training

- Inspector Training Courses
 - Online eLMS FAA 27100162, Intro to Part 147
 Aviation Maintenance Technician Schools for GA
 Airworthiness ASIs.
 - Virtual Instructor-Led (vILT), FAA 21000113, Aviation Maintenance Technician Schools
 - vILT Prototype next week 3/25, then will be offered regularly
- Inspector courses may be available for public upon request

Compliance Program

- Uses the most effective means to return a certificate holder to full compliance
- Emphasis on root cause and corrective actions that address the root cause (as opposed to reacting to event outcome)
- Promotes an open, problem-solving approach to allow safety problems to be understood through exchange of information
- Evolution towards a Just Culture



Breakdown of Compliance Cases Since 2021

Part 147:

- 14 Compliance Actions
- 2 Enforcement Cases

Enforcement cases for part 65, Subpart D, Mechanics:

- 1. 65.81(b), Understand current instructions of the manufacturer/manuals
- 2. 65.81(a), Perform/supervise maintenance
- 3. 65.92(a), Inspection authorization duration
- 4. 65.93(c), Inspection authorization renewal
- 5. 65.95(a)(2), Perform an annual or progressive inspection
- 6. 65.95(c), Notify change of fixed base of operation



Questions/Feedback



- The policy office for part 147 rulemaking, policy, and guidance is:
 - Office of Safety Standards, Aircraft Maintenance Division (AFS-300). Division Manager: Jackie Black
 - ➤ Airman and Special Projects Group (AFS-320), Manager: John "Jay" Hiles
 - ➤ Airmen Section, Section Manager: Kevin Morgan
- Division Email: 9-AWA-AFS-300-Maintenance@faa.gov