



P.O. BOX 234
JENKS, OK 74037

703.548.2030
ATEC@ATEC-AMT.ORG
ATEC-AMT.ORG

May 8, 2023

Sent via email

David Boulter
Acting Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Avenue SW
Washington DC 20591

David.Boulter@faa.gov

Re: Expanding access to airman testing

Mr. Boulter:

On behalf of the aviation technician education community, including the 192 FAA-certificated aviation maintenance technician schools (AMTS), the Aviation Technician Education Council (ATEC) respectfully requests expeditious expansion of the Organization Designation Authorization (ODA) program to include examiner delegations.

The council's reason for this request is simple: forty percent of AMTS graduates do not take the oral and practical exam necessary to receive FAA mechanic certification. Access to FAA-designated examiners is recurrently cited as one of the largest barriers to student testing.

Five years ago, the agency called a meeting with industry stakeholders to discuss a planned expansion to the ODA program that would allow air agency certificate holders (including part 147 schools) to manage their own testing delegates, greatly expanding capacity to meet student testing demand. The proposed path to resolution was through a revision to ODA procedures found in Order 8100.15.

Since then, industry has eagerly awaited the welcomed change; unfortunately, the policy approval process has stalled while testing capacity challenges have grown worse.

The FAA designee database lists 250 designated mechanic examiners (DME)—fewer than existed one year ago. The FAA reported that DME conducted 9,755 original issue mechanic tests last year. The current DME population would need to add another 1,700 tests per year, an increase of around 20 percent, just to test students expected to graduate from AMTS this year.

The situation is even more tenuous given our joint efforts to increase mechanic supply to meet industry demand.

While it is difficult to determine the current testing capacity given DME availability varies across the network, given current testing challenges, the council has branded insufficient testing capacity as the biggest bottleneck in the mechanic workforce pipeline.

A few years ago, in response to a congressional inquiry, the FAA offered the following timeline on the expected publication of Revision C to Order 8100.15:

- February 2022: Incorporate policy into draft Order 8100.15
- April 2022: Complete internal AVS review
- February 2023: Complete legal and DOT review and internal/external comment periods and comment disposition
- March 2023: Issue Order
- March 2024: FAA and ODA holders complete update of procedures manual
- March 2024: Complete outreach and education

Given the target publication date has come and gone, ATEC requests an update to the timeline and reiterates its call for expansion of the FAA's ODA program to include DME, so that DME approvals are not solely dependent on the FAA local official's ability to approve and oversee those designations.

We thank you for the opportunity to provide our feedback and invite a follow-on discussion should you seek clarity on the council's request.

Sincerely,



Crystal Maguire
Executive Director

cc: Chris Thomas, Manager, Airman Testing Standards Branch, Regulatory Support Division,
Christopher.Thomas@faa.gov
Scott Geddie, Manager, Policy and Oversight Section, Organization Designation
Authorization Office, Scott.Geddie@faa.gov