

March 9, 2023

Karen Lucke
Manager, Regulatory Support Division
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Dear Ms. Lucke:

On behalf of the aviation training community, who provide invaluable and specialized training to crewed and uncrewed pilots, instructors, mechanics, parachute riggers, flight engineers and dispatchers to maintain the highest levels of customer service and safety in the National Airspace System, the undersigned write this letter to voice our joint concerns for the current and future state of FAA knowledge exam testing.

Knowledge Test Accessibility

The FAA knowledge test contractor, PSI, recently announced a significant reduction to their third-party testing provider reimbursement rates. This reduction—announced barely a month before its January 1, 2023, implementation—resulted in a rate decrease to third-party providers by more than 65% for most exams.

The undersigned have significant concerns that the fee change will result in the closure of third-party testing centers, many of them small businesses, and serious hardship on pilot and mechanic applicants unable to access FAA knowledge exams in a timely and cost-effective manner. Given the acute demand for certificated pilots, and widespread initiatives seeking to grow qualified personnel, the community is highly vigilant of any obstructions to FAA certification. The changes imposed by PSI do not make a positive contribution to our pipeline development efforts; instead, PSI's actions introduce barriers to entry in direct opposition to FAA initiatives, industry efforts, and recent congressional mandates.

PSI maintains that the fee reductions will not impact applicants, yet the contractor avoids transparency and refuses to provide data necessary for third parties to validate its assertions. Specifically, our request for a complete list of testing locations, seating capacity, and the distribution of PSI-owned vs. third-party testing facilities was denied by the contractor. PSI also declined an industry request to delay the fee change implementation to allow for engagement and feedback.

In the absence of verifiable data, the community has been forced to facilitate cumbersome surveys and outreach to assess the impact the fee change has or will have to testing capacity. A survey of part 147 aviation maintenance schools suggests that ten percent of testing centers have closed since the new reimbursement rate went into effect. One third of A&P school respondents reported that PSI's change in testing fee reimbursement resulted in a reduction in testing capacity to their students, and more than half said that PSI's decision greatly or somewhat impacted students' access to testing.

Diminished access to testing could not come at a worse time. It is widely held that the availability of a diverse, qualified workforce is the biggest threat to growth in our industry. Airlines are grounding planes for lack of pilots. Maintenance and repair facilities are unable to find adequate numbers of qualified mechanics. Further barriers to testing will only exacerbate an already tenuous situation.

Knowledge Test Facilitation

The quality of FAA knowledge test facilitation performed by PSI is also a concern. The community has noticed a lack of progress toward benchmarks that are required under the test management services contract. The aviation training community has worked directly with the FAA to ensure these minimum standards are met (e.g., through the ARAC ACS Working Group) since the PSI contract was awarded; however, by all accounts, these benchmarks have not been satisfied by PSI per its contractual obligations to the FAA.

We have observed the following shortcomings in the FAA testing system: (1) incomplete and inaccurate public sample exams that correspond to the tests given; (2) form tests that are still being used, even after 5 years of development work; (3) test maps based on the previous FAA coding system (content/specific/topic) not the airman certification standard (ACS) codes, conflicting with the established ACS process; (4) applicants unable to review missed questions (as they were prior to PSI taking over testing administration); (5) knowledge exams slow to develop, hindering safety, such as not fully integrating drones into the aviation system.

These failures have a direct impact on the community's ability to retrain so that applicants can successfully retest, resulting in unprecedented practical exam failure rates. Exacerbating these issues is PSI's poor customer service—well known in the aviation testing community, increased testing costs, and reduced testing access. In short, PSI has obstructed the pilot and mechanic workforce pipeline and disrupted the aviation training community.

Future Opportunities and Recommendations

For the reasons stated above, the undersigned contend that PSI is not meeting the needs of the expanding aviation community or our airman applicants. We respectfully request the FAA take the following actions to address these concerns:

1. Perform and publish an independent, FAA assessment of knowledge test accessibility before and after the January 1, 2023 fee change, including quantifying the net change in seat capacity for each FAA test, the impact to testing accessibility (i.e., decreased access geographically), and PSI's ability to provide quality replacements for third-party testing center seats that leave the network.
2. Develop additional ways to increase testing capacity and lessen industry exposure resulting from the current single-provider framework. Alternative proctoring methods and additional providers should be explored, including virtual proctoring and/or utilization of the current network of accredited institutions holding Part 141 and/or 147 air agency certificates.
3. Using stakeholder feedback, produce and publish an assessment of PSI's performance under the FAA contract, what benchmarks have not been met, and shortfalls that should be addressed to ensure proper performance through the initial term.
4. Perform an assessment of the FAA's current certification process, assessing the effectiveness of the Agency's strong emphasis and reliance on knowledge exams relative to other forms of competency testing.

In closing, we request a meeting to allow the community to elaborate on these concerns, propose possible resolutions, and agree on the next steps to ensure the FAA airman testing system supports a safe, efficient, and sustainable aviation training environment and National Airspace System.

Sincerely,

Aircraft Owners and Pilots Association
ATP Flight School
Aviation Supplies & Academics
Aviation Technician Education Council
Embry-Riddle Aeronautical University
Experimental Aircraft Association
Flight School Association of North America
National Air Transportation Association
National Association of Flight Instructors
National Flight Training Association
Society of Aviation and Flight Educators
Sporty's
University of North Dakota

cc: Billy Nolen, Acting Administrator, FAA
David Boulter, Acting Associate Administrator, Aviation Safety, FAA
Lawrence Fields, Acting Executive Director, Flight Standards Service, FAA
Robert Ruiz, Director, Office of Safety Standards, FAA
Chris Thomas, Manager, Airman Testing Standards Branch, FAA
Ryan Smith, Airman Testing Standards Branch, FAA
Heather Krause, Director, Government Accountability Office