

ATEC Annual Conference 2022

General Session II: The New Part 147



Federal Aviation
Administration



Date: March 21, 2022

Agenda

- **Background on the Part 147 rulemaking**
- **Current Status**
- **Rule Implementation**
 - **Rule effective date**
 - **Public-facing guidance**
 - **FAA Guidance**
 - **FAA Training**
 - **Implementation Challenges**
- **Resources**
- **Questions/Feedback**



Background on Part 147 Rulemaking

- **Part 147 NPRM and SNPRM (Docket: FAA-2015-3901)**
 - The previous part 147 rulemaking is being withdrawn along with its notices and comments.
 - Notification of the withdrawal will be posted in the Federal Register.
- **Part 147 Interim Final Rule (IFR) (Docket: FAA-2021-0237)**
 - Section 135 - “Promoting Aviation Regulations for Technical Training” of the Consolidated Appropriations Act of 2021, is the foundation of the new Part 147 regulation.
 - The Act was passed Dec. 27, 2020; it directed the FAA to issue an interim final rule within 90 days (March 2021)
 - The FAA adopts the statutory language of the Act and implements the language directly into the regulations
 - FAA finds “good cause” to waive prior notice and comment (skip NPRM).



Current Status

- **Existing Part 147 Regulations**

- The existing part 147 regulations remain in effect until the effective date of the part 147 interim final rule is published.
Important: AMTS must continue to comply with existing regulations.

- **Final Rule Publish**

- The interim final rule (IFR) is expected to publish in the Federal Register in the first half of 2022.
- An “interim final rule” is essentially a “final rule”. Once published, this rulemaking is completed (with some exceptions).

- **Advance Copy of Final Rule**

- On March 10, at the ARSA Conference, FAA’s Associate Administrator for Aviation Safety, Billy Nolen, announced that the part 147 interim final rule (IFR) has been signed by the Administrator.

- The Interim Final Rule is not yet published. The FAA posted an advanced copy of the regulation:

<https://www.faa.gov/newsroom/part-147-aviation-maintenance-technician-schools-amts-interim-final-rule>.

- A major part of the IFR is the incorporation by reference of the Mechanic ACS into part 147. AMTS must establish a curriculum that aligns with the Mechanic ACS.

- The Mechanic ACS will be published concurrent with the Federal Register Notice for the IFR, and will be available at:
www.faa.gov/training_testing



Implementation

- **Final Rule Effective Date**

- The rule will be effective 120 days after publishing
- Upon the effective date, AMTS must be in compliance, and have new OpSpecs issued, in accordance with the new part 147 regulations.
- Upon the effective date, AMTS not in compliance, or without new OpSpecs, may not conduct part 147 training operations.

- **Public-facing Guidance**

- A revised AC 147-3 will be made available concurrent with the publish date of the IFR, at: https://www.faa.gov/regulations_policies/advisory_circulars/
- The information for AMTS certificate holders and applicants on www.faa.gov will be updated after the publication of the IFR. https://www.faa.gov/licenses_certificates/airline_certification/amts/



Implementation

- **FAA Personnel Guidance**

- The FAA will publish a Notice and revised 8900.1 guidance.
- All FAA guidance is expected to follow the publication of the regulation.

Important: Existing guidance will remain in effect with respect to current part 147 requirements, until the effective date of the new part 147 requirements under the interim final rule.

- **FAA Personnel Training**

- The FAA will provide briefings to the inspector workforce after the publication of the IFR and will be available to answer questions/provide clarity .



Implementation

- **Implementation Challenges**

- **“Light Switch” effectivity** – The statute states (in part) *“Upon the effective date of the interim final regulations ... part 147 ... (as in effect on the date of enactment of this title) ... shall have no force or effect on or after the effective date of such interim final regulations.”*

Important: This results in on/off effectivity of the new/old part 147 requirements, upon the effective date of the interim final rule.

- **120 day effectivity timeframe:** All AMTS are required to be in compliance of the new requirements.

- **Implementation Tasks for currently certificated AMTS (general overview)**

- Develop the descriptions required by new § 147.5.
- Revise the AMTS curriculum to align with the Mechanic ACS.
- If the AMTS is not accredited, develop an AMTS Quality Control System for FAA approval.
- AMTS that desire to add training locations during the initial transition to the new requirements may have additional implementation tasks.



Resources

Note: Some resources may not be available until the publish date, or shortly after the publish date, of the interim final rule in the Federal Register.

- New part 147 rule and preamble <https://www.regulations.gov/docket/FAA-2021-0237>
 - Advance Copy: <https://www.faa.gov/newsroom/part-147-aviation-maintenance-technician-schools-amts-interim-final-rule>.
- Mechanic ACS (also available in the rulemaking docket upon rule publication in the Federal Register)
www.faa.gov/training_testing/testing
- AC-147-3C (also available in the rulemaking docket upon rule publication in the Federal Register)
 - Draft - https://www.faa.gov/aircraft/draft_docs/afs_ac/
 - Final (once published) - https://www.faa.gov/regulations_policies/advisory_circulars/
- Notice 8900.616, Part 147, Aviation Maintenance Technician School, New Regulations and OpSpecs
 - https://www.faa.gov/regulations_policies/orders_notices/
- 8900.1 Guidance <https://drs.faa.gov/browse>
(New guidance will be available shortly after rule publication in the Federal Register.)
 - Volume 2, Chapter 12 (AMTS Certification)
 - Volume 6, Chapter 10 (AMTS Inspection)
 - Volume 3, Chapter 18, Section 11 (AMTS OpSpecs)



Questions/Feedback



- **The policy office for part 147 rulemaking, policy, and guidance is:**
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