



The New Part 147

The Next 120 Days: A Checklist



Upcoming Weekly Webinars

[Aligning Curriculum to the ACS: New 147.17 Training Requirements](#)

[Opportunity Awaits: New 147.15 Training Provided at Another Location](#)

[Accreditor Deference: New 147.23 Quality Control Systems](#)

[A Quality Check: New 147.25 Minimum Passage Rate](#)

Previous Recordings:

[May 27, 2022: The New Part 147, An Overview](#)



Reading Assignment

[Interim Final Rule \(effective 09.21.22\)](#)

[Advisory Circular 147-3C](#)

[Mechanic Airman Certification Standards](#)

[Mechanic Airman Certification Standards Companion Guide](#)

[Notice N8900.616 \(Inspector Guidance\)](#)



Resources

www.atec-amt.org/the-new-part-147

- [Gap Analysis \(Rev. 3\)](#) ([record of revisions](#) and previous versions)
- Previously-recorded webinars and conference sessions
- Operations specifications request letter template (free for members, use the member password as the coupon code)



Overview

- Regulatory basis for required action items to show compliance
- Operation specifications paragraphs and information required for each as applicable



§ 147.3 Certificate required

No person may operate an aviation maintenance technician school without, or in violation of, an aviation maintenance technician school certificate and the **operations specifications** issued under this part.



§ 147.5(b) Application requirements

An application for a certificate and rating to operate an aviation maintenance technician school must include the following:

- (1) A description of the **facilities**, including the physical address of the applicant's primary location for operation of the school, and any additional fixed locations where training will be provided, and the **equipment and materials** to be used at each location;
- (2) A description of the manner in which the school's **curriculum** will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under subpart D of part 65 of this chapter;
- (3) A description of the manner in which the school will ensure it provides the necessary qualified **instructors** to meet the requirements of § 147.19; and
- (4) Any additional information necessary to demonstrate compliance with the requirements of this part.



§ 147.15 Training provided at another location

A certificated aviation maintenance technician school may provide training at any fixed location other than its primary location, provided the **additional training location** meets the requirements of this part and is listed in the certificate holder's operations specifications.



§ 147.17 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.
- (b) FAA-S-ACS-1, Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standards, November 1, 2021, is incorporated by reference into this section...



§ 147.19 Instructor requirements

Each certificated aviation maintenance technician school must:

(a) **Provide qualified instructors** to teach in a manner that ensures positive educational outcomes are achieved;

(b) Ensure instructors either—

(1) Hold a mechanic certificate with one or more appropriate ratings; or

(2) If they do not hold a mechanic certificate, are otherwise specifically qualified to teach their assigned content; and

(c) Ensure the student-to-instructor ratio does not exceed 25:1 for any shop class.



§ 147.23 Quality control system

- (a) Each certificated aviation maintenance technician school must—
- (1) **Be accredited** within the meaning of 20 U.S.C. 1001(a)(5); or
 - (2) **Establish and maintain a quality control system** that meets the requirements specified in paragraph (b) of this section, and is approved by the Administrator.
- (b) The quality control system specified in paragraph (a)(2) of this section must provide procedures for recordkeeping, assessment, issuing credit, issuing of final course grades, attendance, ensuring sufficient number of instructors, granting of graduation documentation, and corrective action for addressing deficiencies.



AMTS OpSpecs (AC 147-3C, ¶ 2.2.1)

- OpSpecs are authorizing documents issued to an AMTS by which an AMTS must comply (see 147.3).
- Part 147 OpSpec templates and policy are developed by the Office of Safety Standards, Aircraft Maintenance Division.
- The FSDO works with the AMTS to populate the OpSpecs with information and authorizations specific to the AMTS.
 - The FAA issues “Required” OpSpecs to all AMTS.
 - The FAA issues an “Optional” OpSpec to an AMTS depending on specific operations of the school.



Web-Based Operations Safety System (WebOPSS)

- OpSpecs can be maintained and revised electronically through WebOPSS
- Designated Persons (A007) may request access
- Electronic signature requires that the Designated Person have a Digital Certificate Service (DCS) certificate at <https://dcs.faa.gov/>



Decommissioned OpSpecs

- A006 Management Personnel
- A026 Authorizations/Limitations (Distance learning authorization)
- B002, B003, B004 Requirement Minimum Curriculums



Issuing OpSpecs (AC 147-3C, ¶ 2.2.2)

- A002, Definitions and Abbreviations (Required). Lists definitions of words or phrases used in the part 147 OpSpecs.
- A003, Ratings (Required). Lists the ratings held by the AMTS.
- A004, Summary of Special Authorizations and Limitations (Required). Identifies all optional/nonrequired OpSpec paragraphs applicable to the AMTS.



Issuing OpSpecs (AC 147-3C, ¶ 2.2.2)

- A005, Exemptions (Optional). Lists any exemptions used by the AMTS.
- Impact on current 147 exemptions—
 - Early testing is provided for in § § 147.31 and 65.75. Early testing exemptions no longer necessary.
 - No hour requirements, so exemptions providing relief to hour requirements are no longer necessary (Skills USA and AMC).
 - Relief provided on student-to-instructor ratios will continue to be valid.



A001, Issuance and Applicability (Required)

AMTS name

Primary location physical address

Primary location mailing address

Primary point(s) of contact

Air Agency Certificate number



A007, Designated Persons (Required)

- Current A006 (management personnel) is decommissioned
- Designated Persons are individuals the AMTS has designated to apply, receive, sign, and change OpSpecs on behalf of the AMTS.
- Should also be responsible for ensuring OpSpecs are revised when needed.
- Option to receive OpSpecs electronically or manually (see A025). If signing digitally, this person also needs a digital certificate.
- Best practice: Choose more than one person so you have a backup.



A008, Additional Training Locations (Optional)

- Lists the additional training locations of the AMTS.
- For accredited programs, consider whether the accreditation extends to those additional training locations.
- Need to prepare facility, equipment, and materials description for each additional training location.
- Consider waiting until after the effective date to add additional training locations if there's a risk of holding up issuance of the OpSpec.



A013, Instructors (Required)

A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of 147.19 (refer to 147.5(b)(3)).



A015, Facilities, Equipment, and Materials (Required)

- A description of the AMTS **facilities** at the primary location, and each additional training location.
- A description of the AMTS **equipment** used at the primary location, and each additional training location.
- A description of the AMTS **materials** used at the primary location, and each additional training location.



A025, Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals/Documents (Optional)

- No longer references your recordkeeping system and records location authorizations.
- Used to describe use of electronic signatures, electronic recordkeeping (e.g., completion certificates), and/or electronic manuals/documents.
- If your accredited, you will not have to submit separate procedures, but will need to identify the documents your signing electronically and how you're maintaining security of that signature.



A027, Quality Control System (Required)

Authorizes how the AMTS meets the QC system requirements of § 147.23(a).

- For nationally accredited AMTS, provide the accrediting agency of the school. (Which means you'll also need to notify the FAA if your accreditation status or accreditor changes.) The AMTS will also need to send evidence of accreditation.
- For non-nationally accredited AMTS, provide FAA-approved procedures for recordkeeping, assessment, issuing credit, issuing final course grades, attendance, ensuring sufficient number of instructors, granting of graduation documentation, and corrective action for addressing deficiencies



B001, Curriculum (Required)

Includes a description of the manner (or reference to the description) in which the school's curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under part 65 subpart D.

Include details on the curriculum basis (e.g., credit-hours, seat time, competency, etc.), delivery methods, and/or focus.



Compliance with § 147.17: ACS Alignment

- Do your gap analysis
- Fill in the gaps
- Use the worksheet as evidence of compliance
- FAA should have access to the curriculum not for approval purposes, but for purposes of demonstrating alignment
- Keep up with the ACS, when it is revised the program will be required to revise its curriculum in line with the standard



Other Considerations

- Descriptions vs. document reference
 - For references, the AC suggests that the OpSpec include the document title and revision level, meaning the AMTS will need to ensure the OpSpec is revised as those manual provisions are revised
 - May also lead to the FAA asking for a copy of the documents
- Level of specificity in descriptions
 - Enough information to show compliance
 - Not too much information so that you have to continually revise the content
 - Should not be used as a way for the FAA to create requirements not supported by the regulation (e.g. the local office should not insist that your description includes a 1900 hour seat time requirement).
- The descriptions are required but do not necessarily require FAA approval



OpSpecs and Effective Date

- Send required information well in advance of the Sept. 21, 2022 compliance deadline.
- OpSpec paragraphs may be issued at different times depending on the impact the change will have under the current rule. So, anticipate two waves of issuance, one prior to effective date and one on the effective date.



OpSpec Request Letter Template

- Intended for paper OpSpecs, could be adjusted to supplement a WebOPSS submission
- Welcome feedback and revision
- Order at [https://www.atec-amt.org/store/p18/Operations Specifications Request Letter Template.html](https://www.atec-amt.org/store/p18/Operations_Specifications_Request_Letter_Template.html)
- Need the members-only password to access (ask Tarra if you don't know it: tarra.ruttman@atec-amt.org)





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