



The New Part 147

**Opportunity Awaits: Additional
Training Locations**



Upcoming Weekly Webinars

[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](#)

[The Next 120 Days: A Checklist](#)

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

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



Reading Assignment

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

[Advisory Circular 147-3C](#) (submit comments/feedback to ATEC)

[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](#)) ([samples](#))
- Previously-recorded webinars and conference sessions
- [Operations specifications request letter template](#) (free for members, use the member password as the coupon code)



ATEC Washington Fly-In

September 21, 2022

Register at www.atec-amt.org/fly-in



§ 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*.



§ 147.13 Facilities, equipment, and material requirements

(b) For certificated aviation maintenance technician schools that provide training at more than one location in accordance with § 147.15, *the facilities, equipment, and materials used at each location must be appropriate to the curriculum or portion of the curriculum, and the number of students being taught, at that location.*



Interim Final Rule Preamble

- A distance learning system is considered an instructional delivery method intended to allow for flexible scheduling and varied location settings and, therefore, is not considered a fixed location other than the primary location of the school. (See Footnote 29)
- Additional training locations may be located outside the United States, provided the additional location meets the requirements of part 147 and is listed in the certificate holder's OpSpecs.



Advisory Circular 147-3C

- **Facility descriptions** must be included for each additional training location. The facilities of each additional training location must meet the requirements of part 147 and be listed in the AMTS OpSpecs, pursuant to § 147.15 (see 2.8.1.2).
- **All or a portion of the AMTS curriculum** may be taught at an additional training location (see 2.8.4.2).
- Pursuant to § 147.27, the FAA may **inspect** each additional training location requested by the AMTS, prior to (and following) adding the location to the AMTS OpSpecs (see 2.8.4.4)



Inspector Guidance (Order 8900.1)

- Buildings co-located on a campus do not need to be considered separate/additional training locations (see page P-2)
- If you are/have been conducting training at a location other than the address listed on your operations specifications, get it added to your operations specifications as an additional training location (see page P-3)
- Where applicable, established quality control (QC) system procedures may need to be revised to describe differing procedures at different locations. AMTS with FAA-approved QC systems would need to submit revisions to the QC system to the FAA for approval (see page P-3)



Oversight of Additional Training Locations

- FAA tracking and managing of additional training locations—SAS will generate numbers for each additional training location
- Process for when the primary and additional training locations cross geographic FSDO boundaries



AMTS Considerations

- For accredited schools, the AMTS is ultimately responsible for ensuring compliance at the additional training location.
- For non-accredited schools, ensure the additional fixed location is included in your quality system.



Scenario 1: High School Dual Enrollment Programs



High School Dual Enrollment

- Requires high school teacher to be adjunct instructor for AMTS.
- Selected existing high school courses such as:
 - Applied Technical Mathematics
 - Basic Electricity
 - Physics
- In conjunction with a curriculum such as Choose Aerospace for the entire General.

High School Dual Enrollment

- Advantages:
 - Dual credit
 - High School credit
 - College credit
 - Reduced tuition (for example 20% of normal tuition)
 - Ability to take FAA General Knowledge Exam (for entities offering entire General Curriculum)
- Concerns:
 - May require advanced degree and/or certification (depends upon AMTS)
 - Equipment and curriculum investment for extensive offerings.

High School Concurrent Enrollment

- Allow high school students to attend AMTS.
 - At BRCC high school students can attend:
 - ½ day as a junior
 - ½ day as a senior
 - Graduate with an FAA Mechanic's Certificate with Airframe & Powerplant rating
 - Many complete an A.A.S. degree – start college as a junior
 - Utilizes existing facility, faculty, staff, etc.
 - Requires articulated agreement with high school
 - Counselor, principal, & superintendent approval
 - AMTS director of training

Scenario 2: Industry Partnerships



PARTNERSHIP VISION

Traditional Theory (lecture) courses would be taught by the AMTS.

Laboratory (hands-on) course would be taught by the Aviation MRO (where feasible).

Students could be interns

Paid (preferably) employee (trainee)

Volunteer Intern

Students would need to apply & be accepted to both AMTS & MRO

Interns (employees) would be rotated through a series of lab where competencies would be verified.

PARTNERSHIP VISION

Suggested Laboratory Internships	Areas of Competencies
General Aviation Lab	Cleaning & Corrosion Control Fluid Lines & Fittings Aircraft Weight & Balance Aircraft Materials, Hardware, and Processes Ground Operations & Servicing
Metallic Structures Lab	Sheet Metal Structures Welding
Non-Metallic Structures Lab	Composites Wood Structures Plexiglas Interiors
Avionics and Electrical Lab	Aircraft Electrical Systems Aircraft Instrument Systems Communication/Navigation Systems

PARTNERSHIP VISION

Suggested Laboratory Internships	Areas of Competencies
Landing Gear Lab	Landing Gear Systems Hydraulics and Pneumatic Systems
Inspections Airframe Lab	Flight Controls Airframe Inspections Environmental Systems Fire Protection Systems
Reciprocating Engines Lab	Reciprocating Engines Engine Electrical Systems Engine Lubrication Systems Ignition & Starting Systems Fuel Metering Systems
Turbine Engine Lab	Turbine Engines Engine Inspection Engine Fuel Systems Exhaust Systems

Scenario 3: New Programs with Independent Enrollment





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