

Part 65 Guidance Bundle Changes Overview Briefing



Highlights of Changes – 8900.1, Volume 5, Chapter 5

The following sections of FAA Order 8900.1, Volume 5, Chapter 5, related to mechanics and parachute riggers, have been revised:

- Section 1 Added content. Provides an overview of all part 65 certificates covered in Chapter 5 and provides certain information common to all sections.
- Section 2 Renamed and revised content. Provides discussion and guidance on mechanic test authorizations based on practical experience.
- Section 3 Renamed and revised content. Provides discussion and guidance on issuance of temporary mechanic certificates, including verifying an applicant meets the eligibility requirements of part 65.
- Section 9 Revised content. Provides discussion and guidance on parachute rigger test authorization and issuance of temporary parachute rigger certificates.
- Section 11 New section. Provides procedures for oral and practical testing of mechanic applicants (revised from FAA Order 8900.2, Chapter 6).
- Section 12 New section. Provides procedures for oral and practical testing of parachute rigger applicants (revised from FAA Order 8900.2, Chapter 6).

NOTE: This briefing is intended to provide a highlight of the revision. Affected persons MUST READ the actual guidance section for details of the revised content.



Sections Naming – 8900.1, Volume 5, Chapter 5

Order 8900.1 Volume 5, Airman Certification Chapter 5, Part 65	Previous Section Title	New Section Title
Section 1	Introduction to Part 65 Certificates	No title change
Section 2	Certificate Airframe and/or Powerplant Mechanic/Added Rating	Certificate Airframe and/or Powerplant Mechanic: Authorize a Mechanic Applicant to Test
Section 3	Certificate Foreign Applicants Located Outside the United States for Part 65 Mechanic Certificates/Ratings	Certificate Airframe and/or Powerplant Mechanic: Issue a Temporary Mechanic Certificate (Original/Added Rating/Amendment)
Section 9	Certificate Part 65 Parachute Rigger/Added Rating	No title change
Section 11	N/A - Chapter 6 of Order 8900.2	Administer an Oral and Practical Test: Mechanic Applicant Under Part 65 Subpart D
Section 12	N/A – Chapter 6 of Order 8900.2	Administer an Oral and Practical Test: Parachute Rigger Applicant Under Part 65 Subpart D



Section 1 – Introduction to Part 65 Certificates

This section is meant to provide an overview of the certificates covered in Volume 5, Chapter 5 as well as information that is common to all sections in the chapter. This section includes:

- Discussion on 14 CFR part 65, subpart A contents Excludes guidance on air traffic controller certificates
 - § 65.11, Application and Issue Discussion on using prior versions of forms, form signature and submission (from Notice 8900.651)
 - § 65.13, Temporary Certificates How to access FAA Form 8060-4 (from Notice 8900.666)
 - § 65.16, Information on how an airman can request certificate replacement (from www.faa.gov)
 - § 65.19, Retesting after Failure Sample statement of additional instruction located in this section.
 - § 65.21, Change of Address Information related to releasability of an airman address, how an airman can request an address change, and general information related to airman addresses (from www.faa.gov)
- Discussion on Superseded and Surrendered Airman Certificates
 - Added figures and references to sample statements for certificate surrender, or rating surrender (certificate downgrade)
 - Discussion on surrender of repairman certificates issued under § 65.101 (air carrier and repair station repairman certs)
 - Discussion on how to appropriately destroy a superseded airman certificate (i.e., shredding, hole punch) (from Notice 8900.490)
 - Added information and figure for the "Declaration of Loss" submitted if surrendering but the certificate has been lost.
- Overview of **Subpart C through F** (Dispatcher Mechanic Repairmen Parachute Rigger)
 - Overview of the certificate eligibility requirements, privileges & limitations
 - Added table to clarify IA renewals based on a recent issuance.
 - Does NOT contain specific procedures related to certificate issuance specific procedures found in the certificate section



Section 1 – Highlights of new/revised guidance

This section includes: (continued)

- FAA Airman Records paragraph includes timeframes for forwarding certification files, addresses (email and mail) for the Airman Certification Branch (AFB-720), guidelines/standards for digitizing certification files and encrypting emails and files. These addresses are NOT repeated in subsequent sections.
- General discussion on **SFAR 100-2** Certificate specific instructions found certificate specific section
- General information on how the public can request an **exemption** from a part 65 requirement.
- Information on the process for requesting special accommodation during certification testing.
- Information on how the regulatory exceptions to the English language requirements apply to mechanic and parachute rigger testing.
- Information on the use of **Remote Technology (RT)** when conducting the certification tasks related to this Chapter. This guidance compliments the general RT guidance in Volume 1, Chapter 2 Section 9.
 - You will NOT find specific RT guidance in each section of Chapter 5; if you can meet the guidance by doing RT, then RT is acceptable.
 - The only specific restriction against using RT is for designees Designees may not conduct any portion of a test or issuance of a temporary certificate using RT.
- Use of RT permits sending temporary airman certificates via email. RT information discusses:
 - PII sent within FAA email domain Figure for "How to Digitally Encrypt an Email"
 - PII sent outside of FAA email domain must be encrypted Figure for "Tutorial on How to Encrypt with Adobe".



Section 2 – Authorize a Mechanic Applicant to Test

This section is now limited to discussing the procedures for authorized FAA personnel to provide mechanic applicants authorization to test, when the applicant meets § 65.77 by way of practical experience.

Tasks/Activities covered in Section 2:

- Authorize a mechanic applicant to test (experience-based applicants). (3501, 5501)
- Authorize a mechanic applicant to test under SFAR 100-2. (3501, 5501)
- Authorize an AMTS student mechanic applicant to test under 14 CFR § 65.80. (3501, 5501)
- Airman certification support (e.g., review of applications resulting in denial, answering certification questions etc.) (3540, 5540)

Organization Section 2.

- Paragraphs with applicable <u>general information and discussion</u> on the tasks/activities;
 - This section discusses the requirements of the regulation, interpretations, and policy on how to do the task.
 - In many places examples are included to help clarify intent or desired outcome.
- Paragraph with prerequisites and coordination requirements;
- Paragraph with references, forms and job aids;
- Paragraphs with applicable procedures for conducting each task/activity
 - This section contains the procedural steps for completing the task.
 - You may need to refer to the "General Information and Discussion" paragraphs to learn/understand how to do the task.
- Paragraph describing the task outcomes to complete each task/activity.



Section 2 – Highlights of new/revised guidance

Highlights of the Section 2 revision include:

- Added discussion on AMTS early general testing applicants (general written test only) reference 65.75(c) and 147.31 (from AMTS final rule)
- Updated references to Mechanic Airman Certification Standards (Mechanic ACS) where applicable (from AMTS final rule)
- Added discussion and procedures related to § 65.80 test authorization and changes entries on FAA Form 8610-2. (from Notice 8900.666)
- Experience in aircraft manufacturing is acceptable to use towards meeting 65.77 requirements (made in 7/20/23 editorial update)
- Added a note regarding the Department of Labor Military Apprenticeship Program (USMAP) This program is NOT equivalent to JSAMTCC, however time and practical experience under this program can be used towards meeting the § 65.77 experience requirements.
- Separate Procedures paragraphs for:
 - Authorize a Mechanic Applicant to Test (experience-based applicant) (includes civil and military experience)
 - Authorize an AMTS Student Applicant to Test Under § 65.80.
 - Authorize a Mechanic Applicant to Test under SFAR 100-2.
- Figures updated to reflect new FAA Form 8610-2



Section 2 – Highlights of new/revised guidance

Highlights of the Section 2 revision include: (continued)

- Experience-based applicants: Removed reference to "50% of ACS subjects" Because the regulation does not hold applicants to a "50%" standard, including in guidance is not consistent with the regulation.
 - Instead, ASIs must evaluate practical experience applicants to verify if the applicant has a **cross-section** of practical experience with the procedures, practices, materials, tools, machine tools, and equipment generally used in constructing, maintaining, or altering airframes or powerplants.
 - Documented evidence is always required. Examples of ways ASIs could verify an applicant meets 65.77 include:
 - 1. Determine if the applicant has experience in at least half of the subjects of the Mechanic ACS (applicable to the rating requested);
 - 2. Verify an individual has the spent the required time obtaining experience while performing work under a military specialty code (evaluated by JSAMTCC and listed in the MOS tables of this section).; or
 - 3. Review a letter from a foreign CAA that verifies the required time and practical experience was obtained when obtaining that CAA certification.
 - To assist ASIs and FS offices with critical thinking and evaluation of 65.77, examples of applicant experience scenarios meeting (or not meeting) 65.77 experience requirements are provided. These are examples only and do not represent all possible examples.
- Experience-based applicants that have experience in a listed military specialty code(s) may use the specialty code to show they have a cross section of practical experience. However, ASIs must ensure the individual actually performed aircraft maintenance work under the code(s) for 18 or 30 months, as applicable to the rating(s) requested.
- This guidance change does not discredit how we have previously done mechanic test authorizations. Rather, it is intended to highlight that the way we have always done these authorizations is how we ensure applications have practical experience with the procedures, practices, materials, tools, machine tools, and equipment generally used in constructing, maintaining, or altering airframes or powerplants.
 - It also is meant to clarify to FAA personnel that there **is more than one way an ASI can determine** (see examples 1 through 3 above) if an applicant has the necessary practical experience, as long as the ASI determines the regulation is met. However, the burden is on applicants to actually show (provide evidence) to the FAA of their practical experience.



Section 3 – Issue a Temporary Mechanic Certificate

This section is now limited to discussing the procedures for issuing a temporary mechanic certificate. It applies to FAA ASIs and FS designees authorized to issue mechanic certificates. This information is not repeated in the new Section 11 on oral and practical testing.

Tasks/Activities covered Section 3:

- Issue a temporary airman certificate (FAA Form FAA Form 8060-4) for a mechanic. (3508, 5508)
- Issue an emergency replacement temporary airman certificate for a mechanic. (3508, 5508)
- Amend a mechanic certificate. (3507, 5507) (name, DOB, nationality, gender changes, remove English language limitations)
- Process a surrender of a mechanic certificate or rating. (3570, 5570)
- Review a certification file from a designee. (Activity tracked using the Designee Management System (DMS))

Organization Section 3.

- Paragraphs with applicable <u>general information and discussion</u> on the tasks/activities;
 - This section discusses the requirements of the regulation, interpretations, and policy on how to do the task.
 - In many places examples are included to help clarify intent or desired outcome.
- Paragraph with prerequisites and coordination requirements;
- Paragraph with references, forms and job aids;
- Paragraphs with applicable <u>procedures</u> for conducting each task/activity
 - This section contains the procedural steps for completing the task.
 - You may need to refer to the "General Information and Discussion" paragraphs to learn/understand how to do the task.
- Paragraph describing the task outcomes to complete each task/activity.



Section 3 – Highlights of new/revised guidance

Highlights of the Section 3 revision include:

- Added discussion regarding the 65.71(a)(3), the 24-month testing period, with examples.
- Added procedures for receiving/reviewing applications and on verifying an applicant's eligibility for the certificate/rating requested
- Includes information and revised procedures on applicants meeting 65.3, Certification of Foreign Airman, and how the applicant can show evidence
 the certificate is needed.
- Added discussion/procedures on when fees must be collected for certification activities
- Added discussion on the purpose of reviewing an applicant's government issued photo identification is for identity, not address or gender verification.
- Added discussion around English language determination and exceptions to the English language requirements.
- Included Procedures paragraphs for:
 - Receiving/Reviewing Applications paragraph also applies to Section 2 when authorizing an applicant to test.
 - Verify Eligibility for the Certificate/Rating paragraph also applies to Section 2 when authorizing applicant to test.
 - Issue a Temporary Mechanic Certificate
 - > Issue an Emergency Replacement Temporary Airman Certificate
 - Process an Amendment to an Airman Certificate
 - Process a Surrender of a Certificate or Rating



Section 3 – Highlights of new/revised guidance

Highlights of the Section 3 revision include: (continued)

- Added procedures for completing FAA Form 8610-2 at the time of certificate issuance.
- Added a table with procedures for filling out a temporary mechanic certificate
- Added procedures on conducting the certification file review for certifications done by designees
- Added a table summarizing the required Certification File Contents for a mechanic certification (from Notice 8900.666)
- Added a paragraph and table regarding processing amendments to an airman certificate (name, citizenship, gender, etc. changes)
 - Revised to allow a statement from a physician or clinical psychologist as evidence of a gender change.
 - Added information on removing the English Language Limitation for when an airman's English language skills have been validated.
- All figures updated to reflect new FAA Form 8610-2



Section 9 – Certificate Part 65 Parachute Rigger/Added Rating

This section was revised to compliment the new Section 12 on parachute rigger oral and practical testing and to eliminate duplication of information. It contains procedures on both FAA test authorization and temporary certificate issuance for parachute rigger applicants. Certificate issuance information is not duplicated in the new Section 12 and applies to FAA ASIs and FS designees authorized to issue parachute rigger certificates.

Tasks/Activities Section 9:

- Authorize a parachute rigger applicant to test. (3502, 5502)
- Issue a temporary airman certificate (FAA Form FAA Form 8060-4) for a parachute rigger. (3508, 5508)
- Issue an emergency replacement temporary airman certificate for a parachute rigger. (3508, 5508)
- Amend a parachute rigger certificate. (3507, 5507)
- Process a surrender of a parachute rigger certificate or rating. (3570, 5570)
- Review a certification file from a designee. (Activity tracked using the Designee Management System (DMS))

Organization of Section 9.

- Paragraphs with applicable **general information and discussion** on the *tasks/activities*;
 - This section discusses the requirements of the regulation, interpretations, and policy on how to do the task.
 - In many places examples are included to help clarify intent or desired outcome.
- Paragraph with prerequisites and coordination requirements;
- Paragraph with references, forms and job aids;
- Paragraphs with applicable <u>procedures</u> for conducting each task/activity
 - This section contains the procedural steps for completing the task.
 - You may need to refer to the "General Information and Discussion" paragraphs to learn/understand how to do the task.
- Paragraph describing the task outcomes to complete each task/activity.



Section 9 – Highlights of new/revised guidance

Highlights of the Section 9 revision include:

- Added discussion on:
 - Parachute rigger eligibility requirements for certification, performance, and recordkeeping
 - Verifying parachute rigger experience
 - Making changes (amendments) to parachute rigger certificates
- Included Procedures paragraphs for:
 - Receiving/Reviewing Applications, Verify Eligibility for the Certificate/Rating
 - Authorize a Parachute Rigger Applicant to Test
 - Issue a Temporary Parachute Rigger Certificate
 - ➤ Issue an Emergency Replacement Temporary Airman Certificate
 - Process an Amendment to an Airman Certificate
 - Process a Surrender of a Certificate or Rating
- Added procedures for completing FAA Form 8610-2 at the time of certificate issuance.
- Added a table with procedures for filling out a temporary parachute rigger certificate
- Added procedures on conducting the FAA certification file review for certifications done by designees
- Added a Table summarizing the required Certification File Contents for a parachute rigger certification
- Figures updated to reflect new FAA Form 8610-2
- Some content refers back to mechanic sections 2 and 3, to avoid repeating information
 - When the referenced section or paragraph is applicable to Mechanic Certificates, apply the same procedures as applicable to a Parachute Rigger Certificate.



Section 11 – Administer an Oral and Practical Test: Mechanic

The content of Section 11 is information previously contained in FAA Order 8900.2:

- Administer an oral and/or practical test for a mechanic applicant (3504, 5504)
- Reconstruct a lost certification file (3540, 5540)
- The content was revised to reflect the recent changes to:
 - FAA Form 8610-2, introduced in Notice 8900.651 and republished in N8900.695.
 - Testing using the Mechanic ACS and revised FAA Form 8610-2, introduced in Notice 8900.666
- This section does not include procedures for certificate issuance ASIs and DMEs authorized to issue a temporary mechanic certificate must refer to Volume 5, Chapter 5, Section 3.
- At all times Flight Standards designees must comply with additional guidance found in FAA Order 8000.95, Designee Management Policy, as applicable to their designation.
- The section is organized into the following paragraphs (does not follow the same organization used in Sections 1 through 10):
 - Reporting Systems
 - Objective
 - · General Information for Conducting Oral and Practical Tests
 - Conducting and Grading Mechanic Oral and Practical Tests
 - · Completing the Certification Process After Testing
 - Procedures for Applicants Not Issued a Temporary Airman Certificate After Testing (e.g., Applicants under Age 18, 65.80 applicants)
 - Prerequisites and Coordination Requirements
 - References, Forms, and Job Aids
 - Procedures Since most of the procedures are embedded in the above listed paragraphs, this is very high-level procedures paragraph that refers to those paragraphs.
 - Task Outcomes This paragraph includes the procedures for reconstructing a lost certification file.



Section 11 – Highlights of Changes (since Notice 8900.666)

Highlights of the Section 11 revision include:

- All tests and portions of a test obtained from the MTG must be destroyed after the test is given or cancelled do not retain tests, portions of tests, questions or practical projects outside of the MTG. Failure to comply could result in loss of access to the MTG or termination.
- During pre-test interview, the examiner must inform the applicant:
 - What constitutes cheating, and what will happen if the applicant is found cheating during any portion of the test.
 - The entire oral and practical test must be completed. Questions or projects not completed are recorded as NOT TESTED. Tests with NOT TESTED questions are failed tests and a retest will be necessary.
- Applicants may use a DME-provided electronic device; The designee must monitor the use of the device to ensure cheating does not occur using online access.
- Designees may use a current .pdf version of FAA Form 8060-4 to fill out a Temporary Airman Certificate. However, designees are not authorized to
 digitally sign the form. Designees must print the form once filled, and sign using pen and ink.
 - Additionally, because designees do not have access to the eForms system, designees must contact their managing specialist to obtain a current version of the electronic form, in a fillable .pdf format.
- Figures are updated to reflect the most recent FAA Form 8610-2.
- DMEs may digitize certification file and securely send to the managing office/specialist. Do NOT send both a paper and an electronic file.



Section 11 – Highlights of Changes (since Notice 8900.666)

Highlights of the Section 11 revision include: (continued)

COMPLETING/SCORING THE TEST

A test cannot be passed if any questions or projects are NOT TESTED. The evaluator must ask the applicant all the oral questions, practical projects and practical questions on the applicant's downloaded test before calculating a passing score.

- The evaluator must stop the test, and mark the test as failed, after more than 30 percent of the total or questions or projects (each project includes 2 practical questions) have been failed.
 - NOTE: TO BE CLEAR, THE EVALUATOR MUST STOP THE TEST AT THE POINT THE APPLICANT FAILS THE TEST BUT MUST NOT
 STOP THE TEST AT THE POINT A PASSING SCORE IS GUARANTEED. TO ACHIEVE A PASSING TEST RESULT (I.E., MINIMUM 70
 PERCENT), THE APPLICANT MUST COMPLETE THE ENTIRE TEST GENERATED BY THE MTG.
- Each practical project consists of a skill element and two practical questions. The applicant may use reference material to complete the practical
 project including answering the practical questions). Once a practical project is begun, the evaluator must test the entire project, and record the
 results accordingly.
- The DME must have the MTG calculated passing grade before issuing a successful applicant a temporary mechanic certificate.



Section 12 – Administer an Oral and Practical Test: Parachute Rigger

- The content of Section 12 is information previously contained in FAA Order 8900.2:
 - Administer an oral and/or practical test for a parachute rigger applicant (3503, 5503)
 - Reconstruct a lost certification file (3540, 5540)
- The content was revised to reflect the revised FAA Form 8610-2 introduced in Notice 8900.651.
- This section does not include procedures for certificate issuance ASIs and DPREs must refer to Volume 5, Chapter 5, Section 9.
- At all times, Flight Standards designees must comply with additional guidance found in FAA Order 8000.95, Designee Management Policy, as applicable to the
 designation.
- The section is organized into the following paragraphs (does not follow the same organization used in Sections 1 through 10):
 - Reporting Systems
 - Objective
 - General Information for Conducting Oral and Practical Tests
 - Conducting and Grading Parachute Rigger Oral and Practical Tests
 - Completing the Certification Process After Testing
 - Procedures for Applicants Not Issued a Temporary Airman Certificate After Testing (e.g., Applicants under age 18)
 - Prerequisites and Coordination Requirements
 - References, Forms, and Job Aids
 - Procedures Since most of the procedures are embedded in the above listed paragraphs, this is very high-level procedures paragraph that refers to those paragraphs.
 - Task Outcomes This paragraph includes the procedures for reconstructing a lost certification file.



Section 12 – Highlights of Changes

Highlights of the Section 12 revision include:

- During pre-test interview, examiner must inform applicant of what constitutes <u>cheating</u>, and what will happen if the applicant is found cheating during any portion of the test.
- Applicants are prohibited from using personal electronic devices, with the exception of nonprogrammable calculators where appropriate. Applicants may use a DPRE-provided electronic device with internet connection to access repair data and regulatory references as appropriate. The designee must monitor the use of the device to ensure cheating does not occur using online access.
- Designees may use a current .pdf version of FAA Form 8060-4 to fill out a Temporary Airman Certificate. However, designees are not authorized to digitally sign the form. Designees must print the form once filled, and sign using pen and ink.
 - Additionally, because designees do not have access to the eForms system, designees must contact their managing specialist to obtain a current version of the electronic form, in a fillable .pdf format.
- Figures are updated to reflect the most recent FAA Form 8610-2.
- DPREs may digitize certification file and securely send to the managing office/specialist. Do NOT send both a paper and an electronic file.



Summary

- Due to the reformatting of sections, change bars do not provide accurate information on content changes. FAA personnel and designees should review this briefing to become aware of changes in guidance location, section formatting, and part 65 certification policy and procedures.
- These policy updates supersede:
 - Notice 8900.651
 - Notice 8900.666
 - Notice 8900.695
 - Order 8900.2, Chapter 6
- FS designees must use the guidance in 8900.1 for conducting mechanic and parachute rigger testing and certificate issuance; the guidance in FAA Order 8900.2 is superseded and that order will be cancelled.



Questions/Feedback









The policy office for part 65 rulemaking, policy, and guidance is:

- Office of Safety Standards, Aircraft Maintenance Division (AFS-300), Division Manager: Jackie Black
 - Airman and Special Projects Group (AFS-320), Manager: John "Jay" Hiles
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The Regulatory Support Division (AFS-850) has primary responsibility for designee guidance and for managing the Mechanic Test Generator (MTG):

- General question inbox:
 - AFS630Comments@faa.gov
- Send questions/concerns regarding the MTG to:
 - 9-AVS-mechanic-test-generator@faa.gov

