December 7, 2020

The Honorable Peter A. DeFazio  The Honorable Sam Graves
Chair  Ranking Member
House Transportation and Infrastructure  House Transportation and Infrastructure
Committee  Committee
Washington, D.C. 20515  Washington, D.C. 20515

The Honorable Rick Larsen  The Honorable Garrett Graves
Chairman  Ranking Member
House Subcommittee on Aviation  House Subcommittee on Aviation
Washington, D.C. 20515  Washington, D.C. 20515

RE: Aviation Industry Urges Inclusion of The Promoting Aviation Regulations for Technical Training (PARTT) 147 Act in the Aircraft Certification Reform Act

Dear Chairmen DeFazio and Larsen and Ranking Members Graves and Graves:

The undersigned organizations, representing a broad cross-section of the aviation community, strongly urge your support of the PARTT 147 Act (S.3043/H.R.5427). The bill would mandate Federal Aviation Administration (FAA) regulatory reform of aviation technician education, empower innovative curriculum development, and reinforce a workforce pipeline that will be vital to a strong, post-pandemic recovery.

The PARTT 147 Act is a bipartisan, bicameral bill introduced by Sen. James Inhofe, Sen. Tammy Duckworth, Rep. Don Young, and Rep. Cheri Bustos; it is cosponsored by seven other senators and 16 representatives. The Act was included in the Senate Commerce Committee’s Aircraft Safety and Certification Reform Act of 2020 (S. 3969), but not in the House’s companion bill, the Aircraft Certification Reform and Accountability Act (H.R. 8408). The undersigned urge that the language be retained in the final legislation.

The aviation industry relies heavily on its technical workforce. Aviation maintenance schools governed by Title 14 Code of Federal Regulations (CFR) part 147 produce the vast majority of certificated mechanics. Efficient and effective part 147 programs are therefore a vital piece of the industry’s technical personnel pipeline.

FAA regulations mandate the subject areas aviation maintenance technician schools must teach to aspiring aviation maintenance mechanics. Unfortunately, those static curriculum requirements have not been significantly updated in more than five decades. The gross regulation-imposed hindrance wastes time, resources, and student tuition, and erodes the attractiveness of the profession.

Seeing no regulatory relief in sight, the undersigned organizations acknowledge that this legislative “fix” is intended to resolve the issue after decades of pushing for a new rule to modernize aviation maintenance technician training, ensure a performance-based
approach to regulatory oversight, and provide flexibility for part 147 schools to partner with high schools and employers.

Leading up to the pandemic, part 147 programs were not able to meet industry’s workforce demand; outdated and burdensome regulatory requirements exacerbated an already short supply of aviation technicians. Given the mass exodus of qualified personnel due to COVID-19, industry’s post-pandemic recovery is greatly dependent on its ability to efficiently and effectively replace the devastating loss of technical experience. Reform of part 147 is now more important than ever.

The undersigned therefore urge you to include the Act in the final version of the certification reform bill and thank you for your consideration and leadership.

Sincerely,

Accrediting Commission of Career Schools and Colleges
Aeronautical Repair Station Association
Aerospace Industries Association
Aerospace Maintenance Council
Aircraft Electronics Association
Aircraft Mechanics Fraternal Association
Aircraft Owners and Pilots Association
Airlines for America
Association for Women in Aviation Maintenance
Aviation Suppliers Association
Aviation Technician Education Council
Cargo Airline Association
Choose Aerospace
International Air Transport Association
International Brotherhood of Teamsters
Modification and Replacement Parts Association
National Air Carrier Association
National Air Transportation Association
National Business Aviation Association
Professional Aviation Maintenance Association
Regional Air Cargo Carriers Association
Regional Airline Association
The Aviation Mechanics Coalition