December 7, 2020

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

The Honorable Rick Larsen Chairman House Subcommittee on Aviation Washington, D.C. 20515 The Honorable Sam Graves
Ranking Member
House Transportation and Infrastructure
Committee
Washington, D.C. 20515

The Honorable Garrett Graves Ranking Member House Subcommittee on Aviation 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

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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