NORTHWEST FLORIDA STATE COLLEGE
AVIATION CENTER OF EXCELLENCE

3152 Airport Road, Crestview, FL 32539
(850) 200-4169

DEPARTMENT OF TRANSPORTATION
2022 FEB 23 A 8:56
DOCKET OPERATIONS

February 4, 2022
U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Petition for Exemption Requirements in 14 CFR Part 65.75 (a) to allow the Aviation Mechanic General (AMG) written tests to be administered after completing the corresponding portion of the curriculum.

Dear Sir or Madam:

Northwest Florida State College operates an FAA-approved Aviation Maintenance Technical School (AMTS) in Crestview, Florida, under Air Agency Certificate NFST653T

PETITION:

Northwest Florida State College is requesting an exemption to 14 CFR Part 65.75(a) to allow the Aviation Mechanic General written tests (AMG) to be administered after AMTS students successfully complete the corresponding portion of the curriculum.

Title 14 of the Code of Federal Regulations, Part 65.75(a) prescribes that applicants must pass a written test, "after meeting the experience requirements of Part 65.77."

65.77 requires applicants to complete training and, "present either an appropriate graduation certificate or certificate of completion from a certificated aviation maintenance technician school" before being eligible to take the written test for a certificate of rating.

RELIEF SOUGHT:

Northwest Florida State College is seeking an exemption from 14 CFR Part 65.75(a) to allow students enrolled in its FAA Approved 14 CFR Part 147 Aviation Maintenance Technician School (AMTS) to take the Aviation Mechanic General written tests (AMG) after completing the corresponding portion of the curriculum, prior to meeting the experience requirements of 65.77.

PERSON(S) TO BE COVERED BY THE EXEMPTION:

Northwest Florida State College Air Agency Certificate Number NFST653T and students enrolled in its AMTS program in the Airframe curriculum.

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SUPPORT TO THE ACTION SOUGHT:

Testing immediately after learning is a universally accepted instructional principle that reinforces learning and is academically sound. This is currently allowed with both the Airframe and Powerplant curriculums, but is not allowed at the completion of the General curriculum.

Students attending the school are enrolled in the Airframe Curriculum. This petition is structured to provide an opportunity for testing following the successful completion of the AMG (General) section of the curriculum.

Northwest Florida State College has established a procedure with the Birmingham Flight Standards District Office to identify and report to them in writing the graduates who are eligible to take the FAA written, oral, and practical tests.

We are proposing that the same procedure would be used to identify and report to the Birmingham FSDO and the Northwest Florida State College those students who are eligible to take the AMG written test after completion of the General curriculum. A Graduation Certificate is currently issued to the student who successfully completes the AMA and/or AMP curriculum. Northwest Florida State College proposes to issue a Certificate of Eligibility to the students who have successfully completed the General (AMG) curriculum requirements. Northwest Florida State College will continue to issue a Graduation Certificate to students after the successful completion of the Airframe and/or Powerplant portions of the curriculum in which the student is enrolled.

The exceptional circumstances encountered by students enrolled in a 14CFR Part 147 AMTS are recognized and provided for by 14 CFR 65.80 which permits a student to take the oral and practical tests prescribed by 65.79 before they meet the applicable experience requirements of 65.77

The time penalty incurred by beginning the testing process before the completion of the entire curriculum would be more than offset by the academic soundness of immediate testing.

PUBLIC INTEREST:

The public interest will be served by allowing aviation maintenance technician students to take the FAA written test covering a body of knowledge immediately following completion of their studies of that material. Student learning will be enhanced and reinforced by the immediate feedback provided by the testing experience. This immediate feedback, coupled with a sense of accomplishment, is expected to encourage students to continue their studies and reduce dropout rates. This petition does not differ materially from others on record, and those requests have been deemed to be in the public interest.

IMPACT ON SAFETY:

A procedure is currently in place to identify and report students who are eligible to take the FAA written, oral, and practical tests. This information is distributed to the Birmingham FSDO. The same procedure would be used to identify and report students who would qualify to take the Aviation Mechanic General written test after the completion of the corresponding portion of the curriculum. All other requirements governing written testing, including time requirements for licensure completion would remain unchanged. A level of safety equal to that provided by this rule would be provided.

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ECONOMIC IMPACT:

By taking the written tests immediately after finishing the curriculum, the reduction of failed tests is expected to reduce the cost of testing to the students.

SUMMARY OF PETITION:

The purpose of this petition is to allow the Aviation Mechanic General written test (AMG) to be administered prior to graduating from the entire curriculum.

Therefore, an exemption extension to 14 CFR, Part 65.75(a) Knowledge Requirements is requested. Northwest Florida State College is petitioning for an exemption from this rule to allow students to take the written examination after completing the corresponding portion of the curriculum.

Northwest Florida State College appreciates the FAAs consideration and any assistance you may be able to provide us in securing approval of this petition. Please contact me if you would like to discuss the content of this request, or if you should require additional instruction.

Respectfully submitted,

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