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Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue
SE West Building, Ground Floor Room W12-140
Washington, DC 20590

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Dear Federal Docket Management:

The office of airman testing (AFS-630) recently published a Mechanic Test Generator FAQ document concerning upcoming changes to the Oral & Practical testing process for mechanics which I and many other Designated Mechanic Examiners (DMEs) have grave concerns about. Specifically the interpretation of 14 CFR Part 65.17.

As a certificated pilot instructor providing instruction to pilot certificate applicants, I do my best to stay as current as possible with the requirements of 14 CFR Part 61. Also, as an active Designated Mechanic Examiner, I am constantly reviewing part 65 when explaining the certification requirements to perspective mechanic applicants. It is interesting the differences in the testing requirements between the two rules.

I have been a certificated mechanic with airframe & powerplant ratings and a rated pilot since 1979. Also, I have been an active Designated Mechanic Examiner (DME) since 2003, and in 2016, I was invited to participate in the Aviation Rulemaking Advisory Committee Working Group (ARAC WG) to help craft the Mechanic Airmen Certification Standards (ACS) for Mechanics. During the past 19 years that I have been an active DME, the testing process has undergone several changes over the years, some good, some questionable.

In the 40+ years that I have held a pilot certificate, I have completed a written, oral and practical exam for eight different pilot certificates or ratings. Each and every time, if I did not successfully demonstrate any of the practical tasks in the airplane, the practical exam was failed and I would be required to retest on what was failed. This requirement is written in 14 CFR Part 61.43(c) and (d) which states:
"(c) If an applicant fails any area of operation, that applicant fails the practical test."
"(d) An applicant is not eligible for a certificate or rating sought until all the areas of operation are passed."

It seems inherent to the FAA's mission of safety, that a pilot need to be able to successfully demonstrate each task in the aircraft that is asked of him or her in order to show that the

applicant can operate the aircraft in a safe manner to justify being issued the requested certificate or rating with a certain level of confidence that the applicant will be able to pilot an aircraft without risking the safety of passengers or crew. While the written exam (airman knowledge test) and the oral exam are graded to a minimum 70% passing score, the practical portion of the exam must be passed to a 100% score in order to demonstrate being able to safely operate the aircraft, as all tasks that the pilot applicant is required to perform must be done safely and within specific standard parameters to pass the practical exam.

I submit that in order to maintain an equivalent level of safety, the testing requirements for the certification of airmen other than crewmembers under 14 CFR Part 65 should be addressed in the same manner as the certification requirements for Pilots and Instructors under 14 CFR Part 61. Currently, the general test procedures in Part 65 as stated in 14 CFR Part 65.17 read as follows:
65.17 Tests: General procedure.
(a) Tests prescribed by or under this part are given at times and places, and by persons, designated by the Administrator.
(b) The minimum passing grade for each test is 70 percent.

As 14 CFR Part 65 stipulates the certification requirements for Air-Traffic Control- Tower Operators, Aircraft Dispatchers, Mechanics, Repairmen, and Parachute Riggers, the test procedures for the issueance of the certificate or rating stipulate a written, oral, and practical exam except for the issue of a Repairmen certificate. It is my assertion that the certification exam requirements should include that the written and oral exams be allowed to be passed with a minimum of 70% score, and the practical exam must be passed with a 100% passing score for the tasks that the applicant is required to demonstrate for the issuance of the certificate or rating.

As an example; what 30% of the practical exam is it acceptable for an **Air Traffic Tower Controller** to be allowed to not be able to demonstrate in order to safely maintain aircraft separation in the National Airspace System? Also, what 30% of the practical exam is it acceptable that an applicant for an **Aircraft Dispatcher** certification be allowed to not be able to demonstrate the duties of an Aircraft Dispatcher in relation to pre-flight planning, navigation, weight & balance, weather, emergency and abnormal procedures, for the safe operation of a passenger carrying flight? In addition, what 30% of the practical exam is it acceptable for a **Parachute Rigger** applicant to not be able to demonstrate concerning the packing of parachutes and still pass the practical exam? I'm sure that anyone who is depending upon the use of a parachute for emergency or routine use would like to have the confidence that the chute will work properly 100% of the time, not just 70% of the time.

By the same token applicants for a **mechanic certificate** should be required to demonstrate satisfactorily 100% of the tasks that are required during the practical exam in order to receive a passing mark and be issued a certificate. Therefore, what 30% of the practical exam should a mechanic applicant be allowed to not be able to demonstrate proficiently and be considered a qualified and certificated mechanic? Should it be the ability to demonstrate the knowledge and skill to establish the empty weight and center of gravity (CG) calculations also known as (weight & balance) upon which every loaded flight weight & balance calculation is based on? This is a basic safety of flight procedure. Or should the applicant be allowed to fail to demonstrate **safe** wheel & tire maintenance procedures, or electrical maintenance procedures, or

proper structural repair procedures. The same holds true for working on the engine or powerplant, as no aircraft is able to pull over to the nearest cloud to repair an engine malfunction. If the engine quits, the aircraft will immediately start to lose altitude and now it will be up to the pilot's skill to control the aircraft to a safe contact with the ground, if possible. Each of these maintenance procedures has a great bearing on the safe operation of the aircraft and the safety of themselves and others in the shop. Therefore, I am petitioning the Federal Docket Management and the FAA for a revision to 14 CFR Part 65.17.

It is recommended that 14 CFR Part 65.17 be revised in the following manner:
65.17 Tests: General procedure.
(a) Tests prescribed by or under this part are given at times and places, and by persons, designated by the Administrator.
(b) The knowledge (written) tests and the oral tests must be passed with a minimum score of 70%.
(c) Completion of the practical test for a certificate or rating consists of the following;

1. Demonstrating basic knowledge and skill in the assigned practical projects.
2. Demonstrating basic skills of risk management.
3. Demonstrating sound judgment and a high regard for safety at all times.
4. Demonstrate a proper application of appropriate manuals, FAA directives, and standard operating procedures.

d) If an applicant fails any task, that applicant fails the practical test.
(e) An applicant is not eligible for a certificate or rating sought until all tasks for each section of the practical exam are passed.

Using the same approach to the evaluation process for the certification of non-aircrew certificate holders that is used with the evaluation of pilot certificate applicants will maintain an equivalent level of safety for all certification testing in Part 61 or Part 65.

Sincerely,

David W Dagenais

David W. Dagenais
Comm. Pilot, CFII, MEI, A&P, IA, DME

Attached is a list of Designated Mechanic Examiners and other Part 65 certificate holders who agree with the recommended method of evaluation of applicants for a certificate under Part 65.

As holders of a 14 CFR Part 65 Airmen Certificate, We whole heartedly agree that allowing an applicant to pass the practical exam while being able to fail up to 30% of the assigned tasks for the exam does not produce a competent certificate holder and will serve to reduce aviation safety.

1. Charles E Hornig FAA A+P
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As holders of a 14 CFR Part 65 Airmen Certificate, We whole heartedly agree that allowing an applicant to pass the practical exam while being able to fail up to 30% of the assigned tasks for the exam does not produce a competent certificate holder and will serve to reduce aviation safety.

1. John W Mayes
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As holders of a 14 CFR Part 65 Airmen Certificate, We whole heartedly agree that allowing an applicant to pass the practical exam while being able to fail up to 30% of the assigned tasks for the exam does not produce a competent certificate holder and will serve to reduce aviation safety.

1. James G. Naylor A&PIA DME _____
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