

# Airman Certification System Working Group Status Report to the Aviation Rulemaking Advisory Committee

**David Oord**

Working Group Chair

November 25, 2019

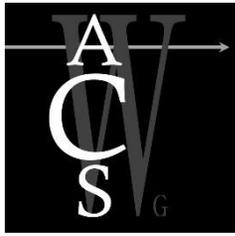




# MEMBERS of ACSWG - INDUSTRY

- David Oord, AOPA
- Paul Alp, Jenner & Block
- Cindy Brickner, SSA
- Paul Cairns, ERAU
- Kevin Comstock, ALPA
- Mariellen Couppee, Honeywell
- Eric Crump, Polk State College
- David Dagenais, FSCJ
- Maryanne DeMarco, CAPA
- Anna Dietrich, Terrafugia
- Rick Durden, Independent
- Megan Eisenstein, NATA
- David Earl, Flight Safety
- Tom Gunnarson, KittyHawk
- Lauren Haertlein, GAMA
- John Hazlet Jr., RACCA
- Jens Hennig, GAMA
- Chuck Horning, ERAU
- David Jones, Avotek
- John King, King Schools
- Janeen Kochan, ARTS Inc.
- Kent Lovelace, UND
- Justin Madden, AMFA
- John McGraw, NATA
- John “Mac” McWhinney, King Schools
- Crystal Maguire, ATEC
- Nick Mayhew, L3
- Phillip Poynor, NAFI
- Jimmy Rollison, FedEx
- JR Russell, NBAA
- Mary Schu, Mary Schu Aviation
- Roger Sharp, Independent
- Jackie Spanitz, ASA
- Burt Stevens, Oxford Flying Club, Inc.
- Robert Stewart, Independent
- Tim Tucker, Robinson
- Robert Wright, NBAA
- Donna Wilt, SAFE
- Roger Woods, Leonardo
- Philipp Wynands, Metro Aviation

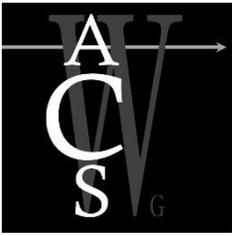




## MEMBERS of ACSWG – FAA SMEs

- Susan Parson
- Barbara Adams
- Bill Anderson
- Brianna Aragon
- Robert Burke
- Dennis Byrne
- James Ciccone
- Bryan Davis
- Joel Dickinson
- Mike Duffy
- Troy Fields
- Ramona Fillmore
- Adam Giraldes
- Shawn Hayes
- Vanessa Jamison
- Laurin J. Kaasa
- Jeffrey Kerr
- Ricky Krietemeyer
- Mike Millard
- Anne Moore
- Kevin Morgan
- Margaret Morrison
- Richard Orentzel
- Katie Patrick
- Andrew Pierce
- Robert Reckert
- Jason Smith
- Shelly Waddell Smith
- Jeff Spangler
- Robert Terry
- Matt Waldrop
- Larry West
- Stephanie Williams
- Bill Witzig
- Jimmy Wynne

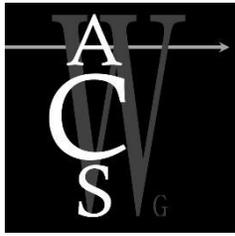




# SUMMARY OF TASKING

- Provide recommendations regarding standards, training guidance, test management, and reference materials for airman certification purposes.
- Continuation of ATP, Instructor, and Aircraft Mechanic certificates.
- Revisions for Private, Commercial, Remote Pilot certificates and the Instrument Rating.
- Added Sport and Recreational Pilot certificates – airplane.
- Added Private, Commercial, ATP, and Instructor certificates and Instrument Rating in additional aircraft categories—
  - Rotorcraft, powered lift, lighter-than-air, glider, etc.





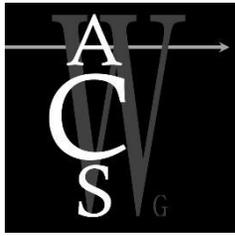
# SCHEDULE

- Interim reports
  - PVT, COM, ATP, Instructor, and AMT certificates and Instrument Rating – no later than June 2018 - complete
  - Covering expanded tasks and proposed timelines for completion – no later than December 2019
- Final recommendation reports no later than June 12, 2020



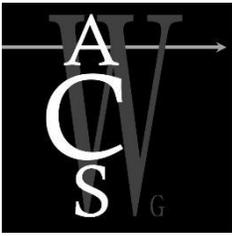
# SCHEDULE

- Future Meetings –
  - December 10 & 11, 2019
  - March 17 & 18, 2020 (*Tentative*)
  - June 23 & 24, 2020 (*Tentative*)



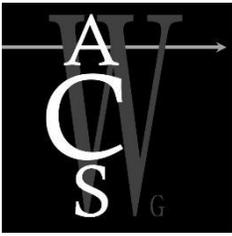
# STATUS OF TASKING

- With the addition of Sport and Recreational Pilot certificates – airplane; and
- Private, Commercial, ATP, and Instructor certificates and Instrument Rating in additional aircraft categories (Rotorcraft, Powered-Lift, Lighter-than-air, Glider, etc.
- Coupled with the partial government shutdown and public review and comment of new standards through Federal Register -
  - Schedule has slipped and working group will likely require additional time to accomplish all tasks
    - Working to determine time and effort needed to accomplish all taskings



# STATUS OF TASKING

- At this week's meeting of the ACSWG, members inquired about the delay in publishing several Airman Certification Standards (ACS) and guidance documents.
  - Delay comes from a new DOT policy, stemming from an Executive Order, issued last December, that any guidance may not contain requirements not explicitly tied to a regulation or statute.
    - ACS's will now require rulemaking because it uses mandatory language for tasks not specifically required in the regulations (e.g. three stalls, approaches with different nav-aids)



# STATUS OF TASKING

- Aviation community members strongly view this interpretation of the ACS/PTS as inconsistent with safety.
  - Requiring rulemaking for almost 30 ACS/PTS documents would require extensive time, resources, and expense, not just once but for every update.
  - Several examples of safety-critical, industry-recommended updates to ACS/PTS certification testing documents have been accomplished and approved by ARAC
    - Would have taken years to incorporate these if rulemaking had been required
  - But now, several elements are being held up –
    - Integrated and improved Mechanic ACS
    - Several powered-lift standards and guidance documents

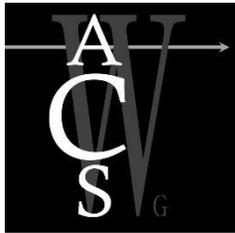




# STATUS OF TASKING

- Do not believe Rulemaking for the ACS would not enhance the process
  - Extensive participation by aviation community and the public through notice and comment
- We view the work accomplished through the ARAC-chartered ACS WG as a model for positive government/industry collaboration on safety.
  - Any change that limits timely implementation of safety changes or;
  - Industry's ability to communicate quickly and openly with the FAA on certification testing requirements
    - would be as a major step back and an obstacle to assuring safety through the airman certification process.
- Impact has put the working group into a virtual holding pattern
  - Been frustrating and negatively impacting working group members morale
  - Impacts reaches far beyond just the ACS
    - Negatively impact safety and efficiency of the entire certification system





# AREAS of ARAC CONSIDERATION

- **Draft Powered-Lift Flying Handbook**
  - Combines
    - Airplane;
    - Helicopter; and
    - New Powered-Lift content into one handbook
  - Provides guidance for new Powered-Lift Airman Certification Standard (FAA-S-ACS-17)

