

## **SAMPLE LETTER OF COMPLIANCE (STATEMENT OF COMPLIANCE, COMPLIANCE STATEMENT)**

**Authority for Letter of Compliance.** Title 49 U.S.C. § Section 44702, Issuance of Certificates, provides the Administrator the authority to prescribe the form and content of applications and certificates.

**Purpose of the Letter of Compliance.** The Letter of Compliance describes how the applicant complies with each individual section of 14 CFR part 147. To benefit the applicant's understanding of all part 147 requirements, the Statement of Compliance (SOC) ensures that all applicable regulatory requirements are addressed during the certification process. The SOC provides a method to ensure the applicant understands each regulatory requirement put forth in the regulation and how the applicant will comply with each requirement.

When developing the Letter of Compliance, the applicant must ensure that the responses reflect how the applicant will comply with any regulatory requirement. The SOC must list each part 147 section and should provide either:

- A brief narrative of the method of compliance, or
- A specific reference to a manual or other document describing the planned method of compliance with the regulation.

The sequence should be the same as the regulations. The SOC should be submitted along with all other formal application attachments.

The FAA will review the SOC during the document compliance phase of certification, and discuss any deficiencies with the applicant.

**Sample Letter of Compliance.** The below information may be used as a template for applicants to base a properly formatted and comprehensive part 147 SOC.

- Each applicable part 147 section is listed in the template.
- Following each section, the template provides sample responses (in italics) which may assist the applicant in crafting a complete response. In some instances, the example invites an operating manual reference; in other instances, the example invites a narrative. However, the example is not meant to require one type of response over the other.
- References to specific documents, facilities, equipment, or personnel are for illustrative purposes, and should not be construed as the only approved methodology for school compliance.

**Note:** The SOC included in this AC is a generic example and must be modified to describe each individual applicant's method of compliance with part 147.

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Statement of Compliance for  
[Applicant Name]  
[Date]

This document provides the manner in which [Applicant] intends to comply with the provisions of part 147.

**Subpart A—General**

**§ 147.1, Applicability.**

This part prescribes the requirements for issuing aviation maintenance technician school certificates and associated ratings and the general operating rules for the holders of those certificates and ratings.

*[Applicant] is prepared to comply with all part 147 requirements and general operating rules, as defined in this document, the [Applicant's] manuals, curriculum documents, and/or other [Applicant] publications.*

**§ 147.3, Certificate Required.**

No person may operate an aviation maintenance technician school without, or in violation of, an aviation maintenance technician school certificate and the operations specifications issued under this part.

*[Applicant] attests that it will not operate or represent itself as a certificated school without, or in violation of an FAA Air Agency Certificate and operations specifications (OpSpecs) issued under part 147.*

**§ 147.5, Application Requirements.**

(a) To be issued a certificate or rating under this part, an applicant must demonstrate compliance with the requirements of this part.

*[Applicant] understands that to be issued a certificate or rating under this part, [Applicant] must demonstrate compliance with the requirements of this part.*

(b) An application for a certificate and rating to operate an aviation maintenance technician school must include the following:

(1) A description of the facilities, including the physical address of the applicant's primary location for operation of the school, and any additional fixed locations where training will be provided, and the equipment and materials to be used at each location;

*[Applicant] has submitted as part of its application attachments, a description of the facilities, including the physical address of the applicant's primary location for operation of the school, and any additional fixed locations where training will be provided.*

*Additionally, [Applicant] has submitted as part of its application attachments a description of the equipment and materials to be used at each location.*

(2) A description of the manner in which the school's curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under subpart D of part 65;

*[Applicant] has submitted as part of its application attachments, a description of the manner in which the school's curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under subpart D of part 65.*

(3) A description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19; and

*[Applicant] has submitted as part of its application attachments a description of the manner in which the school will ensure it provides the necessary qualified instructors to meet the requirements of § 147.19.*

(4) Any additional information necessary to demonstrate compliance with the requirements of this part.

*[Applicant] has submitted the following additional information necessary to demonstrate the requirements of this part:*

- *The curriculum required by § 147.17(a)(1).*
- *Evidence of instructor qualifications meeting § 147.23.*
- *Evidence of accreditation required by § 147.23 (if applicable).*
- *The school's Quality Control (QC) system meeting §147.23(b) (if applicable).*
- *The following additional attachments to show compliance with part 147: (list additional attachments as applicable).*

(c) An application for an additional rating or amended certificate must include only the information required by paragraph (b) that is necessary to substantiate the reason for the additional rating or change sought.

*[Applicant] understands that when applying for an additional rating or an amended certificate, only information that is necessary to substantiate the reason for the additional rating or change sought must be submitted as attachments to the application.*

#### **§ 147.7, Duration of Certificates.**

An aviation maintenance technician school certificate or rating issued under this part is effective from the date of issue until the certificate or rating is surrendered, suspended, or revoked.

*[Applicant] recognizes that the aviation maintenance technician school (AMTS) certificate is effective until it is surrendered, suspended, or revoked.*

### **§ 147.11, Ratings.**

The following ratings may be issued under this part:

- (a) Airframe.
- (b) Powerplant.
- (c) Airframe and powerplant.

*[Applicant] seeks the [enter rating or ratings being sought] rating.*

## **Subpart B—Certification and Operating Requirements**

### **§ 147.13, Facilities, Equipment, and Material Requirements.**

(a) Each certificated aviation maintenance technician school must provide and maintain the facilities, equipment, and materials that are appropriate to the rating or ratings held by the school and the number of students taught.

*[Applicant's] school provides and maintains the facilities, equipment, and materials that are appropriate to the rating or ratings held by the school and the number of students taught. Descriptions of the school's facilities, equipment, and materials are located in [Applicant's] operating manual [insert reference], and have been provided to the FAA for inclusion in the [Applicant's] OpSpecs.*

(b) For certificated aviation maintenance technician schools that provide training at more than one location in accordance with § 147.15, the facilities, equipment, and materials used at each location must be appropriate to the curriculum or portion of the curriculum, and the number of students being taught, at that location.

*At each location of [Applicant's] school, the facilities, equipment, and materials used at each location must be appropriate to the curriculum or portion of the curriculum, and the number of students being taught at that location. Descriptions of the school's facilities, equipment, and materials used at each additional training location are located in [Applicant's] operating manual [insert reference], and have been provided to the FAA for inclusion in the [Applicant's] OpSpecs.*

### **§ 147.15, Training Provided at Another Location.**

A certificated aviation maintenance technician school may provide training at any fixed location other than its primary location, provided the additional training location meets the requirements of this part and is listed in the certificate holder's operations specifications.

*[Applicant] will ensure that each additional training location will meet the requirements of part 147 and [Applicant's] OpSpecs. [Applicants] will notify the FAA of the location of any additional fixed location it intends to provide training at as described in [Applicant's] operating manual [insert procedure reference]. [Applicant] will not train at any additional location not listed in [Applicant's] OpSpecs.*

### **§ 147.17, Training Requirements.**

(a) Each certificated aviation maintenance technician school must:

(1) Establish, maintain, and utilize a curriculum that is designed to continually align with the mechanic airman certification standards as appropriate for the ratings held;

*[Applicant] has designed a curriculum that aligns with the Mechanic Airman Certification Standards (ACS) and will ensure the curriculum continually aligns with the Mechanic ACS by revising its curriculum any time the Mechanic ACS is revised.*

(2) Provides training of a quality that meets the requirements of § 147.25; and

*[Applicant] has designed a curriculum that will provide training of a quality that meets the minimum passage rate requirements of § 147.25. [Applicant] will ensure a pass rate of 70 percent of its students who test within 60 days after graduation, based on 3 years of test data as reported by the FAA, as described in [Applicant's] operating manual [insert manual reference].*

(3) Ensures students have the knowledge and skills necessary to be prepared to test for a mechanic certificate and associated ratings under subpart D of part 65 of this chapter.

*[Applicant] ensures that students will have the knowledge and skill necessary to be prepared to test for a mechanic certificate because the curriculum aligns with the knowledge and skill requirements outlined in the FAA's mechanic certificate testing standards.*

(b) The standards required in paragraph (a)(1) of this section are contained in the Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standards; FAA-S-ACS-1, November 1, 2021, which are incorporated by reference into this section with the approval of the Director of the Federal Register under 5 U.S.C. § 552(a) and 1 CFR part 51. All approved material is available for inspection at the Federal Aviation Administration, Airman Testing Standards Branch/Regulatory Support Division, 405-954-4151, AFS630Comments@faa.gov. It is also available for inspection at the National Archives and Records Administration (NARA). For information on the availability of this material at NARA, email: fedreg.legal@nara.gov, or go to [www.archives.gov/federal-register/cfr/ibr-locations.html](http://www.archives.gov/federal-register/cfr/ibr-locations.html).

*[Applicant] understands that the standards referenced in paragraph (a)(1) of this section are specifically provided in paragraph (b) of this section.*

### **§ 147.19, Instructor Requirements.**

Each certificated aviation maintenance technician school must:

(a) Provide qualified instructors to teach in a manner that ensures positive educational outcomes are achieved;

*[Applicant] ensures its instructors are qualified and that each instructor teaches in a manner that ensures positive educational outcomes are achieved by [insert description of how the AMTS ensures this requirement is met for each instructor].*

(b) Ensure instructors either—

(1) Hold a mechanic certificate with 1 or more appropriate ratings; or

*[Applicant] ensures that instructors who hold an FAA-issued mechanic certificate also hold the appropriate rating relative to the courses/course content the instructor teaches by requiring the instructor to provide [Applicant] with a copy of their FAA-issued mechanic certificate. A copy of the instructor's FAA-issued mechanic certificate is kept on file by [Applicant].*

(2) If they do not hold a mechanic certificate, are otherwise specifically qualified to teach their assigned content; and

*[Applicant] ensures that instructors who do not hold an FAA-issued mechanic certificate are specifically qualified to teach their assigned content. To ensure appropriate qualifications, [Applicant] will request and review the instructor evidence of past training and experience and assign teaching content as appropriate to that training/experience. A copy of the specifically qualified instructors resume and training is kept on file by [Applicant].*

(c) Ensure the student-to-instructor ratio does not exceed 25:1 for any shop class.

*[Applicant] ensures that shop classes maintain a 25:1 student-to-instructor ratio by [insert a description of how the school ensures this ratio].*

#### **§ 147.21, Certificate of Completion.**

Each certificated aviation maintenance technician school must provide an authenticated document to each graduating student, indicating the student's date of graduation and curriculum completed.

*[Applicant] will provide a document to each graduating student that includes the following:*

- *Student's name.*
- *Title of the curriculum from which the student graduated.*
- *The graduation date.*
- *The schools FAA-issued Air Agency Certificate number and school name.*
- *A raised seal evidencing authentication of the document [describe as appropriate to your school].*

#### **§ 147.23, Quality Control System.**

(a) Each certificated aviation maintenance technician school must:

(1) Be accredited within the meaning of 20 U.S.C. § 1001(a)(5); or

*[Applicant] has submitted as part of its application attachments evidence of its accreditation within the meaning of 20 U.S.C. § 1001(a)(5).*

(If the school does not meet the accreditation requirements of § 147.23(a)(1), it must submit a QC system for approval. Enter "not applicable" as a response.)

(2) Establish and maintain a quality control system that meets the requirements specified in paragraph (b) of this section, and is approved by the Administrator.

*[Applicant] has submitted as part of its application attachments its QC system procedures for FAA approval.*

(If the school meets the accreditation requirements of § 147.23(a)(1), there is no requirement to submit a QC system for approval. Enter “*not applicable*” as a response.)

(b) The quality control system specified in paragraph (a)(2) of this section must provide procedures for recordkeeping, assessment, issuing credit, issuing of final course grades, attendance, ensuring sufficient number of instructors, granting of graduation documentation, and corrective action for addressing deficiencies.

*[Applicant] has developed a QC system which includes the procedures required by § 147.23(b).*

*[Applicant] has submitted as part of its application attachments its QC system procedures for FAA approval.*

(If the school meets the accreditation requirements of § 147.23(a)(1), there is no requirement to submit a QC system for approval. Enter “*not applicable*” as a response.)

#### **§ 147.25, Minimum Passage Rate.**

(a) Each certificated aviation maintenance technician school must maintain the pass rate specified in paragraph (b) for the most recent 3-year period.

(b) For students who take an FAA mechanic test under part 65 of this chapter within 60 days after graduation, at least 70% of students must pass one of the following tests or any combination thereof:

- (1) Written test;
- (2) Oral test; or
- (3) Practical test.

(c) For students who take a combination of tests within the 60-day window specified in paragraph (b), an AMTS must count a failure on any one test as a student failure for purposes of determining the pass rate, unless that failed test is subsequently passed within the 60-day window.

*[Applicant] understands that the school must maintain the pass rate described in § 147.25.*

#### **§ 147.27, Inspection.**

A certificated aviation maintenance technician school must allow the Administrator such access as the Administrator determines necessary to inspect the one or more locations of the school for purposes of determining the school’s compliance with the requirements of this part.

*[Applicant] acknowledges that the AMTS may be inspected at any time by the Administrator for purposes of determining the schools compliance with the requirements of part 147. [Applicant] will allow the FAA access at any time to inspect the schools primary location or any additional*

*training location for the purpose of determining the schools compliance with the requirements of part 147.*

**§ 147.29, Display of Certificate.**

A certificated aviation maintenance technician school must display its aviation maintenance technician school certificate at a place in each location of the school, including the primary location and any additional fixed locations, that is visible by and normally accessible to the public.

*[Applicant] will display its FAA Air Agency Certificate, or a copy of the certificate, [insert where the certificate(s) will be located] at the primary location, and [insert where the certificate is located] at each additional fixed location of the school, ensuring the certificate is visible by and normally accessible to the public.*

**§ 147.31, Early Testing.**

When a student satisfactorily completes the general portion of a certificated aviation maintenance technician school's curriculum, the school may issue an authenticated document that demonstrates the student's preparedness to take the mechanic general written test in accordance with § 65.75(c) of this chapter.

*[Applicant] will issue an authenticated document to students who have successfully completed the general portion of the school's curriculum, showing the student's preparedness to take the mechanic general written test in accordance with § 65.75(c).*

*In accordance with § 65.75(c), the school will ensure that it issues an authenticated document that demonstrates satisfactory completion of the general portion of the school's curriculum, and specifies the completion date. The documentation will also include the student's name, the school's name, and the school's FAA-issued Air Agency Certificate number.*