

Federal Aviation Administration
Flight Standards Service
Air Carrier Training Aviation Rulemaking Committee (ACT ARC)

**Recommendation 17-2:
Guidance for Written Tests Conducted under Part 135 and Part 142**

I. Submission

The recommendations below were submitted by the Air Carrier & Contract Training Workgroup (AC&CT WG)¹ for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee at F2F-12. The ACT ARC Steering Committee adopted the recommendations with unanimous consent, and they are submitted to the Associate Administrator for Aviation Safety (AVS-1) as ACT ARC Recommendation 17-2.

II. Statement of the Issue

Current guidance for air carriers and training centers does not address the conduct or administration of written tests. Volume 3, Chapter 19, Section 7, Flightcrew Qualification Curriculum Segments, generally addresses written or oral testing, with more detailed guidance provided for Part 121 air carriers. However, no detailed guidance is provided for operators/training centers on how to administer and grade such tests.

The lack of standardized guidance leads to disparate models used by different operators/training centers. Small operators are especially challenged when they do not have sufficient check airman approved under the certificate. The relevant regulatory language under Part 135 can be found in 135.293(a): "...written or oral test, given by the Administrator or an authorized check pilot..." (Part 142 language generally refers to a "written" without specific language regarding administration of the test.) Current guidance does not define the word "given" which leaves it to operators, in consultation with the operator's principal operations inspector (POI), to determine how such tests are administered.

The AC&CT WG acknowledges that a check pilot/check airman (or contract check airman in the case of a 142 training center delivering training to a 135 operator) is required to develop any written test; however, if the check pilot/check airman develops the test and provides an answer key, the conduct and grading of the test is a purely administrative function.

The proposed recommendations and supporting rationale below suggest standardized guidance be developed to address how written tests are administered and graded, which will lead to consistent application across operators/training centers and their FAA oversight personnel.

III. Recommendations

The ACT ARC proposes the following recommendations on guidance related to written tests conducted under 14 CFR parts 135 and 142 for FAA consideration:

The ACT ARC recommends the FAA publish guidance that allows 135 air carriers and 142 training centers to conduct written testing in lieu of oral examinations, when permitted by regulation, and to designate proctors permitted to administer and grade written tests conducted under 14 CFR parts 135 and 142.

¹ The AC&CT WG is comprised of ACT ARC Steering Committee Members including 135 operators, 142 training centers, and membership organizations/industry associations.

The ACT ARC further recommends the FAA include standards in the guidance that describe the conduct and grading of written tests, as well as allow a qualified proctor to conduct any written test conducted in lieu of an oral examination.

IV. Rationale

This particular model proposed by the AC&CT WG is aligned with the model used by Part 135 certificate holders when designating air transportation ground instructors, but can easily be extended to the 142 training center environment in a similar fashion. The general concept of allowing a proctor to administer/grade the test/examination is consistent with the idea that an air carrier can appoint an air transportation ground instructor qualified to instruct certain modules of the training curriculum.

While the conduct and grading of the test is a purely administrative function, the members wanted to ensure the proctor has sufficient knowledge to carry out the responsibilities. In order to address this concern, the members suggest air transportation ground instructor model outlined in Order 8900.1, Volume 3, Chapter 20, Section 5, Paragraphs 3-20-5-13 and 3-20-5-17. Similar to an air transportation ground instructor, a proctor “must meet the certificate holder’s training and qualification requirements to conduct ground instruction.” The operator would also be required to “maintain documentation of the training and qualification for each [proctor], and must make that documentation available for inspection by the FAA upon request.” The operator would specify qualifications, training, and method of designation in the operator’s manual or training program. The POI would conduct surveillance as needed to ensure tests are administered in accordance with the procedures in operator’s manual. By aligning this process with the air transportation ground instructor model, the responsibility is correctly placed on the operator to designate the proctor, and the POI to conduct surveillance.

Pursuant to Order 8900.1, Volume 3, Chapter 19, Section 10, Flightcrew Recurrent Training Curriculums, three sets of testing elements for oral or written testing are specified in Paragraph 3-1340(B):

1. The first set of test elements is general in nature and covers the applicable provisions of: 14 CFR parts 61, 63, 91, 121, and 135; the operator’s operations specifications (OpSpecs); and the operations manual. This segment only has to be completed once during each qualification cycle and does not need to be repeated if the flightcrew member is qualifying on more than one aircraft.
2. The second set of test elements includes aircraft systems, operating procedures, Weight and Balance (W&B), airport ground operational safety, and performance data relative to each specific make and model of aircraft. This segment of the test module must be completed on each make and model aircraft on which the flightcrew member is to serve. When the flightcrew member is qualifying to serve on more than one variation of an aircraft, a written or oral differences test segment is also required.
3. The third set of test elements consists of special or unique operations. Special operations testing may be included in the general or aircraft specific segments, as appropriate.

The operator (or training center) could designate proctors in the same fashion with the ability to administer and grade tests/examinations on a) non aircraft-specific/general training; b) aircraft-specific training; and/or c) special or unique operations. The proctor would be able to administer the test and grade the test (including correction to 100%).

The internal controls associated with the designation of proctors (in a manner similar to the designation of air transportation ground instructors under 14 CFR part 135) would ensure the

appropriate level of responsibility for the operator/training center, affording the operator/training center some flexibility in how such tests/examinations are administered and graded.

The AC&CT WG concurred that check airmen must be involved in the development of the test/examination, as well as any grading questions/disputes. However, based on current industry practices shared among the members, the AC&CT WG felt that designation of proctors would alleviate a number of administrative inefficiencies in the testing process.

The members noted that this approach can and should be used for any test that can be conducted as a written test (in some cases in lieu of an oral examination). As long as the proctor is qualified to administer that particular module(s), then the proctor can administer and grade the test.

In support of standardizing the manner in which written tests are conducted, the members also recommend the FAA include any limitations and specific provisions related to how tests can be graded, a standardized passing percentage for written tests, and guidelines for proctors in the new guidance. As a companion effort, the members also encourage the FAA to review current definitions and terminology used in relation to qualification modules, including computer-based instruction (CBI) and distance learning, to address all forms of written tests.

V. Background Information

AC&CT WG Scope of Work:

These recommendations complete the following component of the AC&CT WG Scope of Work:

Consider strategies to improve 135 operator training and checking, including training/checking conducted by 142 training centers.

ACT ARC Initiatives:

These recommendations complete the following Steering Committee Initiative assigned to the AC&CT WG:

- Initiative #40: Review of 135.299 line checks and associated guidance.