



Mr. David Roakes

04-15-2020

The spring semester classes for Nashua Community College (NSUT025K), which will be covered by this temporary, Operation Specifications is as follows:

Freshman

AVTN 103 Airframe Structures II

AVTN 104 Materials & Processes

AVTN 106 Aviation Electronics

Senior

AVTN 207 Reciprocating Engines II

AVTN 210 Turbine Engines & Systems

AVTN 211 Carburetion & Fuel Systems

AVTN 212 Engine Electrical Systems



# FAA

## Aviation Safety

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### Memorandum

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Date: April 1, 2020

To: All Flight Standards District Offices

From: Jackie L. Black, Aviation Safety, Manager, Aircraft Maintenance Division

Subject: **Revised:** Special Guidance for part 147 AMTS Regarding Training Interruptions Related to Coronavirus (COVID-19) and Applicable Deviations to Order 8900.1.

JACKIE L. BLACK JR  
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Date: 2020.04.01 13:51:20 -05'00'

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M330-8000.1-G-2003-0718

This memorandum supersedes memorandum M350-8000.1-G-2003-0716 dated 3/12/2020.

#### Summary of Revision:

- Removed limitations for enrolling new students.
- Added information regarding sharing memo with AMTS.
- Added note regarding returning students to standard procedures following termination of this deviations.
- Added Avionics PTRS tracking codes.
- Added clarifying sentence regarding missed time.
- Added note regarding maximum allowable hours of absence.
- Added paragraph stating the memo will remain in effect until terminated.

The Novel Coronavirus (COVID-19) outbreak has been declared a Public Health Emergency of International Concern (PHEIC) by the World Health Organization (WHO). The impact of this virus has caused multiple states and cities within the US to take action by reducing or limiting public gatherings which includes the closure of schools in some locations. These closures may impact student learning and schedules of some part 147 Aviation Maintenance Technician Schools (AMTS). The actions taken have caused concerns among Flight Standards District Offices (FSDO) with oversight responsibilities of AMTS requesting flexibility to minimize interruptions to student learning. The Aircraft Maintenance Division has reviewed these concerns and provides the following guidance to assist the AMTS community.

- d. The following guidelines authorize a deviation from FAA Order 8900.1, Volume 2, Chapter 12, Section 1, paragraph 2-1417(C), Section 2, paragraph 2-1450, and Section 3, paragraph 2-1487(C):
  - i. The AMTS must develop procedures describing how it will administer the alternate method of distance learning to include:
    - 1. A description of the how course content will be delivered and how instructors and students will communicate as needed (i.e. technology).
    - 2. Procedures for tracking student attendance under each subject/topic using the alternate method. The school must maintain a list of those students who were taught under the alternate method.
    - 3. If the AMTS requests alternate testing procedures, it must submit procedures describing the testing process.
  - ii. The AMTS must establish a timeframe for alternate content delivery. The timeframe should align with program semester/defined end dates. Due to the uncertainty of the situation, extensions to the timeframe could be considered at a future date.
- e. The responsible office will complete the following:
  - i. Review the AMTS submission. If alternate testing procedures are submitted, they must ensure the integrity of testing.
  - ii. List the added eligible subjects/topics on OpSpec A026. The following additional information must be listed in the “Provisions, Conditions and Limitations” block for each area:
    - 1. Reference to the AMTS procedures describing the alternate method of distance learning.
    - 2. The expiration date for teaching the content. Future extensions to the timeframe will require a revision to OpSpec A026.
  - iii. Enter a PTRS record using activity code 3316/5316 with the following information. This information will be used by the Aircraft Maintenance Division to track deviations to current 8900.1 for which schools are authorized an alternate method of distance learning in addition to their current authorization.
    - 1. Enter “147” in the 14 CFR block.
    - 2. Enter the school's designator in the “Designator” block
    - 3. Enter *DLALTCV19* in the “National Use Block”.
    - 4. Enter any other appropriate information in the comment field.

2. **Authorize initial use of a temporary Distance Learning Program.**

The FAA recognizes that approval to use a Distance Learning Program can be a time consuming process. This is to ensure that an AMTS using distance learning will provide students with an equivalent level of instruction as a traditional classroom.

- a. Schools may request to use a temporary distance learning program and be authorized distance learning content via OpSpec A026. The responsible Flight Standards office should support requests to conduct appropriate instruction using the temporary distance learning program for a limited timeframe.

e. Below are some examples of ways to implement a temporary distance learning program.

EXAMPLE 1: The AMTS could communicate to students through one of several types of technology, e.g. email, teleconference, video conference, instant messaging. Instructors should initiate substantive communication with their students, either individually or collectively, on a regular basis. In other words, an instructor could use email to provide instructional materials to students enrolled in his or her class, use chat features to communicate with students, set up conference calls to facilitate group conversations, engage in email exchanges or require students to submit work electronically that the instructor will evaluate.

EXAMPLE 2: An AMTS may work out an agreement with another AMTS for their students to receive instruction using another AMTS FAA-Approved distance learning platform and courses.

3. **Temporary Revision of a Schools Allowable Hours of Absence.**

14 CFR 147.31(e) requires an AMTS to use an approved system for determining final course grades and for recording student attendance. The system must show hours of absence allowed and show how the missed material will be made available to the students.

- a. Students missing allowable hours of absence must be provided the missed material by the school. Students are not required to make up missed time, only missed material, except when the student has missed time beyond the approved allowable hours of absence defined by the school. Students missing more than the allowable hours of absence must make up missed-time beyond the defined allowable, or repeat the course, in order to meet curriculum requirements for issuance of a graduation certificate.
- b. The following guidelines authorize a deviation from FAA Order 8900.1, Volume 2, Chapter 12, Section 2, paragraph 2-1449(G):
  - i. Schools may submit a temporary revision of their approved system, with respect to allowable hours of absence and procedures for how missed material will be made available to the students. Flight Standards offices are authorized to allow up to 80 hours of allowable absence.
 

**Note:** The deviation authorizes a total of 80 hours of allowable absence.
  - ii. The AMTS must submit written procedures for approval. The document need only address those areas that are different from its currently approved system. The document should include:
    1. Defined allowable absence.
    2. Procedures for making missed material available to the student.
    3. Procedures for annotating the student record to show how the student was authorized the hours of absence based on this temporary approval. The school must maintain a list of those

- b. The request must include the following information:
  - i. The school name and certificate number for which the request for deviation applies.
  - ii. The specific Volume, Chapter, Section and paragraph(s) for which deviation is being requested.
  - iii. The alternate method being used to comply and the responsible flight Standards offices justification for agreeing to the alternate.
  - iv. The quantity of students affected. The school must maintain a list of those students who were affected by the deviation.
- c. The General Aviation Branch will review the request and, if in agreement, will issue a letter to the responsible office authorizing the deviation.

6. **Exemptions to 14 CFR part 147.**

An AMTS may request an exemption from applicable requirements under 14 CFR part 147. Exemptions requests must be submitted in accordance with the requirements under 14 CFR part 11. An AMTS should be advised that petitions for exemption may take substantially longer compared to deviations to FAA guidance, and the outcome may vary.

The deviation is effective until superseded or terminated. The Aircraft Maintenance Division will notify all responsible Flight Standards offices of revisions or the termination of this deviation.

We appreciate the opportunity to assist you. If you have any additional questions regarding this memorandum, please contact the Aircraft Maintenance Division, General Aviation Branch at (202) 267-1675.

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**A001 . Issuance and Applicability**

**HQ Control: 11/21/2014**

**HQ Revision: 000**

a. These operations specifications are issued to NASHUA COMMUNITY COLLEGE whose principal Air Agency is located at:

Primary Business Address:  
505 Amherst St  
Nashua, New Hampshire 03063

**Table 1 – Primary Point(s) of Contact**

Name	Telephone Number	Fax Number	Email Address
Patrick Geoffroy	603-578-8914	603-882-8690	pgeoffroy@ccsnh.edu

b. The holder of these operations specifications holds Air Agency Certificate Number NSUT025K and is the certificate holder.

c. These operations specifications are issued in accordance with Title 14 CFR Part 147, § 147.5

(b). The certificate holder must operate in accordance with Part 147 and associated authorizations, limitations, and procedures.

d. These operations specifications are effective as of the “Date Approval is effective” listed in each paragraph and must remain in effect as long as the certificate holder continues to meet the requirements of Part 147 as specified for certification or unless otherwise suspended, surrendered, amended, or revoked.

1. Issued by the Federal Aviation Administration.
2. These Operations Specifications are approved by direction of the Administrator.



Digitally signed by Mark A. Auclair, Principal Avionics Inspector (EA65)  
[1] EFFECTIVE DATE: 10/31/2017, [2] AMENDMENT #: 1  
DATE: 2017.10.31 10:16:25 -05:00

3. I hereby accept and receive the Operations Specifications in this paragraph.

  
\_\_\_\_\_

Geoffry, Patrick, Agent for Service



Date

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**A002 . Definitions and Abbreviations**

**HQ Control: 11/21/2014**

**HQ Revision: 000**

All words, phrases, definitions, and abbreviations in these operations specifications are also used in 14 CFR and 49 of U.S.C, Subtitle VII (as amended), unless otherwise defined. The below definitions apply to operations conducted in accordance with these operations specifications.

**Note:** These definitions can enhance understandings between the FAA and the aviation industry. They are not in 14 CFR.

<b>Term or Terms</b>	<b>Definition</b>
<u>Alternative Delivery/Blended Delivery</u>	Multiple approaches to learning, enhanced by different modes of delivery and training resources.
<u>Aviation Maintenance Technician (AMT)</u>	A certificated person rated to perform or supervise maintenance, preventative maintenance or alteration of an aircraft, aircraft appliance, or a part of that appliance, and other duties in accordance with 14 CFR Part 65, §§ 65.85, 65.87, and 65.95. This excludes major repairs and alterations of propellers, and any repair or alteration of instruments.
<u>Aviation Maintenance Technician School (AMTS)</u>	An Air Agency certificated in accordance with 14 CFR Part 147 which trains personnel in AMT knowledge and skills.
<u>Certificate Holder</u>	The holder of the AMTS certificate described in these operations specifications in Part A, paragraph A001 and any of its officers, employees, or agents operating under this certificate.
<u>Certificated Instructors</u>	AMTS instructors holding mechanic certificates and ratings deemed necessary by the Administrator for adequate instruction and supervision of students.
<u>Check</u>	<i>Check</i> means to verify proper operation.
<u>Classroom (Traditional Instructor-led)</u>	A learning environment with basic training facilities, and led by an instructor.

<u>Distance Learning</u>	Distance Learning is a term currently not used in 14 CFR. It is a term used in the FAA and the Aviation industry with various meanings depending on context. For the purposes of this order, distance learning refers to a learning delivery method that is accomplished by an instructor and students that are not physically gathered in a traditional classroom. (Distance learning may be known by other terms such as E-Learning, home study, self-guided training, virtual classroom, distributed training, computer-based training, Web-based training, and others.)
<u>Inspect</u>	<i>Inspect</i> means to examine by sight and touch.
<u>Instructional/Training Aids</u>	Highly specialized tools typically provided by the AMTS, such as tensiometers, micrometers, and torque wrenches. These instructional training aids do not need calibration when used for demonstration or on un-airworthy equipment.
<u>Laboratory</u>	Facilities enabling student demonstrations or participation for instruction in general principles. Laboratory equipment required should match subject taught and teaching level.
<u>Overhaul</u>	<i>Overhaul</i> means to disassemble, inspect, repair as necessary, and check.
<u>Practical Project</u>	A hands-on assignment requiring skills taught at the 2 to 3 teaching level. Students involved in a practical project can use or research documents such as maintenance publications, FAA directives, or manufacturer data.
<u>Quality Standards</u>	Measures of a student's manipulative skills needed to simulate a "return to service" condition of instructional or training aids. These aids do not need to meet "return to service" maintenance criteria.
<u>Repair</u>	<i>Repair</i> means to correct a defective condition. Repair of an airframe or powerplant system includes component replacement and adjustment, but not component repair.
<u>Service</u>	<i>Service</i> means to perform functions that assure continued operation.
<u>Specialized Instructors</u>	AMTS instructors who are not FAA certificated mechanics, and who teach mathematics, physics, basic electricity, basic hydraulics, drawing, and similar subjects.
<u>Special Tools</u>	Tools, such as tensiometers, micrometers, and torque wrenches, typically provided by the AMTS. These tools do not require calibration when used for demonstration or on un-airworthy equipment.
<u>Teaching Level 1</u>	(i) Requires knowledge of general principles, but no practical application. (ii) Requires no development of manipulative skill. (iii) Requires instruction by lecture, demonstration, and discussion.

Teaching Level 2

- (i) Requires knowledge of general principles, and limited practical application.
- (ii) Requires development of sufficient manipulative skill to perform basic operations.
- (iii) Requires instruction by lecture, demonstration, discussion, and limited practical application.

Teaching Level 3

- (i) Requires knowledge of general principles, and performance of a high degree of practical application.
- (ii) Requires development of sufficient manipulative skills to simulate return to service.
- (iii) Requires instruction by lecture, demonstration, discussion, and a high degree of practical application.

Training Resources

Training Resources may include:

- Personnel -- training management and instructors
- Facilities -- a central training site, off-site learning centers, or other geographic locations
- Equipment stand-alone computers, networks, laptops, local area networks (LANs), or the web
- Software -- operating systems, browsers, learning content, or specialized programs
- Curriculum -- videos, computer-based lessons, workbooks, study guides, CDs, DVDs, part-task trainers
- Third Party -- vendors, contractors, or consultants
- Classroom -- as previously defined

Note: Resource descriptions should be comprehensive enough to clearly define the role of each resource.

Troubleshoot

As used in Part 147 appendices B, C, and D, *Troubleshoot* means to analyze and identify malfunctions.

1. Issued by the Federal Aviation Administration.
2. These Operations Specifications are approved by direction of the Administrator.



Digitally signed by Mark A. Auclair, Principal Avionics Inspector (EA65)  
[1] EFFECTIVE DATE: 10/31/2017, [2] AMENDMENT #: 1  
DATE: 2017.10.31 10:16:55 -05:00

3. I hereby accept and receive the Operations Specifications in this paragraph.

A handwritten signature in red ink, appearing to read "Geoffry Patrick", written over a horizontal line.

Geoffry, Patrick, Agent for Service

A handwritten date "11/01/17" in red ink, written over a horizontal line.

Date

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**A003 . Aviation Maintenance Technician School Ratings**

**HQ Control: 11/21/2014**

**HQ Revision: 000**

The certificate holder is authorized the following rating(s):

**Ratings**

Airframe and Powerplant

1. Issued by the Federal Aviation Administration.
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[1] EFFECTIVE DATE: 10/31/2017, [2] AMENDMENT #: 1  
DATE: 2017.10.31 10:16:57 -05:00

3. I hereby accept and receive the Operations Specifications in this paragraph.

  
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Geoffry, Patrick, Agent for Service

11/01/17  
Date

**A004 . Summary of Special Authorizations and Limitations**

**HQ Control: 11/21/2014**

**HQ Revision: 000**

**a. The certificate holder, in accordance with the reference paragraphs, is authorized to:**

	Reference Paragraphs
Conduct required curriculum for Airframe (Part 147 Appendix C)	B003
Conduct required curriculum for Powerplant (Part 147 Appendix D)	B004

**b. The certificate holder is *not authorized* and *shall not*:**

	Reference Paragraphs
Use exemptions.	A005
Conduct distance learning training in accordance with the conditions and limitations of A026 and the AMTS approved curriculum.	A026

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2. These Operations Specifications are approved by direction of the Administrator.



Digitally signed by Mark A. Auclair, Principal Avionics Inspector (EA65)  
[1] EFFECTIVE DATE: 10/31/2017, [2] AMENDMENT #: 1  
DATE: 2017.10.31 10:17:00 -05:00

3. I hereby accept and receive the Operations Specifications in this paragraph.

  
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Geoffry, Patrick, Agent for Service



Date

**A006 . Management Personnel**

**HQ Control: 11/21/2014**

**HQ Revision: 000**

- a. The certificate holder is authorized to use persons listed in the following table in its 14 CFR Part 147 Aviation Maintenance Technician School operations as management personnel.

**Table 1 – Management Personnel**

Position Title	Name	Company Equivalent Position Title	Telephone Number	Fax Number	E-Mail	Remarks
Agent for Service	Geoffry, Patrick	Agent for Service	603-578-8914	603-882-8690	pgeoffroy@ccsnh.edu	

1. Issued by the Federal Aviation Administration.
2. These Operations Specifications are approved by direction of the Administrator.



Digitally signed by Mark A. Auclair, Principal Avionics Inspector (EA65)  
[1] EFFECTIVE DATE: 10/31/2017, [2] AMENDMENT #: 1  
DATE: 2017.10.31 10:17:02 -05:00

3. I hereby accept and receive the Operations Specifications in this paragraph.

  
\_\_\_\_\_  
Geoffry, Patrick, Agent for Service

11/01/17  
Date

**A007 . Designated Persons**

**HQ Control: 11/21/2014**

**HQ Revision: 000**

a. The personnel listed in the following table are designated to officially apply for and receive operations specifications for the certificate holder.

**Table 1– Designated Persons to Apply for and Receive Authorizations**

Title	Name	Parts Authorized
Agent for Service	Geoffry, Patrick	A,B

1. Issued by the Federal Aviation Administration.

2. These Operations Specifications are approved by direction of the Administrator.



Digitally signed by Mark A. Auclair, Principal Avionics Inspector (EA65)

[1] EFFECTIVE DATE: 10/31/2017, [2] AMENDMENT #: 1

DATE: 2017.10.31 10:17:05 -05:00

3. I hereby accept and receive the Operations Specifications in this paragraph.

  
\_\_\_\_\_  
Geoffry, Patrick, Agent for Service

*11/21/17*  
\_\_\_\_\_  
Date