

**Petition for Rulemaking**  
**Submitted by:**

**Ben Ingram**  
Founder & CEO  
Warriors in Need (WIN)  
1775 Avenida Cafe Camarillo, CA, 93012  
ben@warriorsinneed.com  
805-910-0523

**Executive Summary**

- Authorize A&P testing for verified MOS codes via updated FAA Order 8900.1.
- Allow qualified veterans to bypass oral & practical tests under 14 CFR § 65.79.
- Maximize taxpayer investment in military training.
- Fast-track experienced workers into civilian aviation careers.

**1. Explanation of Proposed Action and Purpose**

We propose a regulatory change to streamline the FAA certification process for military aviation mechanics. The current system requires military-trained personnel to go through redundant training and testing to receive their FAA Airframe and Powerplant (A&P) certification, despite having extensive, hands-on experience. This petition seeks to allow military aviation mechanics to bypass unnecessary tests (such as oral and practical exams) by recognizing their military training and hands-on experience.

This change would help alleviate the critical shortage of aviation mechanics in the U.S. by allowing military-trained personnel to transition quickly into civilian aviation careers. Additionally, it would save significant time, reduce unnecessary costs for veterans, and remove bureaucratic layers that delay the process of getting highly skilled professionals into the workforce.

**2. The Language Proposed for New or Amended Rule**

We request the following amendments to current regulations to streamline certification for military aviation mechanics:

**1. Proposed Amendment to 14 CFR § 65.79:**

- **Current Regulation:** "Each applicant for a mechanic certificate or rating must demonstrate their ability to perform assigned tasks by passing oral and practical tests appropriate to the rating sought."
- **Proposed Amendment:** (a) Each applicant for a mechanic certificate or rating must demonstrate their ability to perform assigned tasks by passing oral and

practical tests appropriate to the rating sought, **except as provided in paragraph (b) of this section.**

**(b) Applicants who have successfully completed at least 30 months of practical experience in aviation maintenance, as documented and verified by official training and qualification records, are deemed to have met the skill requirements of this section and are not required to take the oral and practical tests.**

**2. Amendment to FAA Order 8900.1 (Volume 5, Chapter 5, Section 2):**

- Amend Figure 5-138 Tables 1-5 column-Possible Creditable Experience, recognizing **ALL** MOS codes as referenced are eligible for testing for **BOTH Airframe & Powerplant (A&P)** certification exams upon demonstrating 30 months of practical aviation maintenance experience as documented in official military records and verified by a military FAA liaison.

**Example per Military Branch**

<b>Current Code</b>	<b>Previous Code</b>	<b>Title</b>	<b>Possible Creditable Experience</b>
2A051-Air Force		Avionics Test Station and Components	<b>Airframe &amp; Powerplant</b>
15F10, 15F20, 15F30-Army	68F10, 68F20, 68F30	Aircraft Electrician	<b>Airframe &amp; Powerplant</b>
E04A-Navy	8303	CH/MH-53E Systems Organizational Maint. Tech.	<b>Airframe &amp; Powerplant</b>
6092-Marine Corp		Aircraft Intermediate Level Structures Mechanic	<b>Airframe &amp; Powerplant</b>

*As indicated in the above example, the intent of this amendment is to update **ALL** MOS codes in Tables 1-5 for Creditable Experience to reflect **BOTH** Airframe & Powerplant (see bold)*

**3. Proposed Addition to FAA Order 8900.1, Volume 5, Section 2, Subparagraph 5-1134 A1:**

- **Applicants who have successfully completed a minimum of 30 months of practical experience in aviation maintenance, as documented by official training records, certification letters, certificates and experience shall be considered to have met the skill requirements for this section and are exempt from taking the oral and practical tests. For applicants with unverified practical documentation, FAA inspectors should refer to Section 1134D for evaluation guidance.**

**3. Explanation of Why the Proposed Action Would Be in the Public Interest**

The proposed regulatory reform serves the public interest in several key ways:

- **Addressing Aviation Workforce Shortages:** The aviation industry is facing a critical shortage of certified Airframe and Powerplant (A&P) mechanics, with 716,000 positions needing to be filled over the next 20 years (according to the Boeing Mechanic Outlook). This includes an average of 35,800 positions annually to replace retiring workers in the commercial sector alone. The VA TAP reports that 200,000 military personnel transition to civilian life each year, providing a substantial pool of skilled veterans. However,

despite this large pool of veterans with aviation maintenance experience, less than 10% transition into civilian aviation roles, according to the Aviation Technician Education Council (ATEC Pipeline Report). Streamlining the certification process for military-trained mechanics could immediately integrate thousands of these skilled professionals into the civilian workforce. To meet the industry's increasing demand, an additional 10% of military-trained aviation mechanics is needed, a need that this regulatory reform would address immediately.

- **Maximizing Taxpayer Investment in Military Training:** Military aviation mechanics undergo extensive, taxpayer-funded training. By recognizing this training and experience for FAA certification, the government ensures that this investment is fully utilized, creating economic and operational efficiency.
- **Enhancing National Security and Public Safety:** Accelerating the entry of skilled military mechanics into the workforce would enhance aviation safety and operational efficiency, benefiting both the industry and the public at large.

#### 4. Information and Arguments Supporting the Proposed Action

- **Reduction in Redundant Training and Costs for Veterans:** Military aviation mechanics often undergo similar training during their military service, and requiring them to repeat it in civilian A&P programs is redundant and inefficient. The proposed change would save veterans time and GI Bill benefits, ensuring they receive only the training they need to fill roles in the aviation industry.
- **Financial Impact on Schools and GI Bill Funding:** While some educational institutions that rely on GI Bill funding may see reduced enrollments due to this change, the GI Bill funds currently spent on redundant training programs would be better utilized elsewhere, ensuring that veterans get the most value from their benefits.
- **Military Certification and JSAMDOC Funding:** The elimination of redundant training and testing could impact programs like **JSAMDOC** that currently receive funding for certifying military personnel. However, these funds would be better spent on efficiently certifying personnel based on their proven experience, streamlining the transition to civilian aviation roles.
- **DME Testing Fees:** The current requirement for military-trained mechanics to undergo oral and practical exams leads to unnecessary and seemingly unregulated costs (as much as \$1,200 per test) for veterans and the aviation industry. Removing this requirement would save both veterans and the industry significant amounts of money.
- **Eliminating Bureaucratic Layers:** The existing certification process for military mechanics is mired in bureaucracy. This proposed reform would streamline the process, eliminating unnecessary paperwork and procedural delays, making the transition from military service to civilian aviation careers faster and more efficient.

## 5. Cost and Benefits of the Proposed Actions

### Cost:

- **Potential Loss of GI Bill Funding for Certain Schools:** Schools offering aviation maintenance programs may experience a loss of GI Bill funding as veterans may no longer need to enroll in redundant training programs.
- **Reduced Funding for Certification Programs:** Programs like **JSAMDOC** that fund the certification of military mechanics could see a reduction in funding. However, these funds could be redirected to more efficient certification methods.

### Benefits:

- **Reduced Costs for Veterans:** Veterans would save money on redundant testing and training.
- **Immediate Entry into the Workforce:** By accelerating the certification process, military-trained mechanics would enter the civilian workforce more quickly, helping address the aviation workforce shortage.
- **Streamlined Certification Process:** The FAA would benefit from a more efficient process, reducing administrative burden and processing time.
- **Support for Veterans' Well-being:** A smoother transition to civilian aviation careers would help reduce unemployment, instability, and related issues like veteran suicide and homelessness.
- **Recognition of Hands-on Experience:** Military mechanics' extensive hands-on training and real-world experience would be valued, ensuring that practical skills are prioritized over book study, allowing veterans to contribute immediately to the aviation industry.

## 6. Recordkeeping and Reporting Burdens

The proposed changes would reduce the current administrative burden on both veterans and the FAA. There would be fewer paperwork requirements and a reduction in the need for scheduling and conducting oral and practical exams for military mechanics. As a result, the recordkeeping burden for both the FAA and educational institutions would decrease, leading to improved efficiency in the certification process.

## 7. Impact on Small Businesses, Small Organizations, and Small Governmental Jurisdictions

Small aviation schools and training programs that depend on GI Bill funding may face a reduction in revenue. However, this change would create opportunities for other organizations focused on more efficient workforce integration, such as veterans' transition support programs and those that provide on-the-job training directly. In the long run, the workforce will benefit from having more skilled aviation mechanics available to support the industry.

## 8. Effect on Natural and Social Environments

The proposed reform would have positive social impacts, particularly in helping veterans transition into meaningful careers. The aviation field offers veterans stability, purpose, and financial security, and the fast-tracked certification process would help prevent the social issues linked to unemployment and instability. Additionally, aviation careers ensure veterans are subject to federal drug and alcohol programs, promoting a healthy, safe, and sustainable lifestyle.

## 9. Call to Action: Implement These Critical Reforms

We respectfully urge the Department of Transportation (DOT) and the Federal Aviation Administration (FAA) to adopt the proposed regulatory changes outlined in this petition to:

- **Allow military mechanics to test for General, Airframe, and Powerplant certifications simultaneously.**
- **Remove unnecessary oral and practical testing for military-trained mechanics** with verified experience (14 CFR § 65.79).
- **Amend FAA Order 8900.1** to recognize military training and practical experience to reduce unnecessary barriers to FAA certification.

**Partner with Warriors in Need (WIN)** to ensure a seamless transition for veterans into civilian aviation careers and help address the aviation industry's workforce crisis.

## 10. Conclusion

This petition proposes a pragmatic solution to address the shortage of qualified aviation mechanics by streamlining the certification process for military-trained personnel. By recognizing their expertise and reducing redundant testing, we can accelerate the transition of veterans into the workforce, providing immediate benefits to both the aviation industry and the veterans who have served our country.

We respectfully urge the FAA and DOT to recognize the invaluable contributions our military personnel have made to our country by providing them with an equivalent opportunity to contribute to the civilian workforce. By streamlining the certification process, we can ensure that the investments taxpayers have made in military training are fully maximized, while also supporting the long-term strength and sustainability of America's aviation workforce.