



April 24, 2025

Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

RE: Docket No. FAA -2024-2531 Modernization of Part 141 Pilot Schools

The Flight School Association of North America (FSANA) respectfully request consideration on the following topics as our constituents, pilot schools across the country have endorsed for the project moving forward.

- 1. Create a stand-alone, centralized Part 141 office.** Most FSDO's lack resources to service pilot schools properly, especially within the DPE area. Pilot Schools often have waiting times between 30-60 days for action regarding their certificate. There is also a lack of standardization between FSDO's, POI's, PMI's and ASI's with inconsistent interpretation of the FAR's and Policy.
- 2. Inadequate amount of DPE's to properly service Pilot Schools.** The low supply of qualified and available DPE's, especially in high volume and specialty areas, has created a vacuum and bottleneck in student airman progression. Often, they wait between 30-60 days for DPE's which causes significant added expense for students to stay current as well as exorbitant pricing structures for airman practical check rides. Focus should be on having enough DPE's and DPE's who are able to act in the position as a mostly full-time activity to provide service to meet the testing needs.
- 3. Increase utilization of modern simulation and time credited toward certification.** With the advancement of technologies in simulation along with Virtual and Augmented Reality/AI, etc. these technologies can increase training scenarios and safety metrics within training. The credit times deserve to be increased for these reasons.
- 4. Examining Authority.** Currently, of the 509 Part 141 Pilot Schools, only 74 hold Examining Authority, which represents 15%. Of the 15%, they perform 7% of Private Pilot testing as presented by the FAA at the Atlanta meeting. While FSANA advocates for Pilot Schools to hold Examining Authority, it is crucial for added FAA oversight, as the push to create certificated pilots may outweigh standards that ensure safety. As for the low number of examining authority schools, the FSDO's simply say "NO" to applicants due to their high workload in

other areas as well as protecting their DPE opportunities. FSANA further suggests that those conducting internal EA testing must meet a higher standard to conduct the testing. An example, currently there are CFI's that conduct the EA testing with less than 500 hours as a result of high CFI turnover.

5. **Organization Designation Authorization (ODA).** Part 183 D was introduced as another tool the FAA could use to alleviate the need for DPE's. This puts another burden on Pilot Schools as the ODA applicants will be managed by the FSDO's. It is hard to fathom FSDO's could manage more capacity based on current staffing issues. FSANA suggests if a pilot school is granted ODA, the oversight MUST be strictly adhered to, so there is not an opportunity to "rubber-stamp" the passing of applicants.
6. **SMS and QMS Utilization.** FSANA advocates for Pilot Schools to adopt these measures to assure better student outcomes and safety as well as providing the FAA with data collection to measure milestones and areas of concern.
7. **Competency and Scenario Based Training Completion as Opposed to Current Pass Rate System.** While FSANA supports forms of competency-scenario based training, it should not be the sole standard of certificate testing. It is imperative that our current multi-step certification of pilots remains intact for proficient mastery and safe pilot development at each stage over time. The current 141 syllabi standard ensures checks and balances at each stage so any deficiency can be caught early and remedied. Proficiency based testing still needs to include proficiency sampling in external airman development through testing of the training to ensure it is truly meeting proficiency standards, not just allowing applicants to proceed if they have met the standard once.
It is also imperative that all aspects of the actual flight portion of the education pathway pass rates remain intact as this measures proficiency at each certification level. FSANA believes this is an effort to adopt a European model of training as well as lower the current 1500-hour rule. FSANA could support a lower, potential 1000-hour rule if certain practices are used such as SMS, QMS, Accreditation, modern simulation and more oversight within the pilot schools.
8. **Accreditation.** It was announced at the Atlanta 141 meeting that Aviation Accreditation Board International (AABI) has partnered with the modernization project. While FSANA applauds AABI's efforts to provide excellence in academia curricula with industry needs, FSANA believes in a total, holistic approach to Accreditation standards that includes all flight portions as well. The International Aerospace Accrediting Commission (IAAC) does exactly that.

9. Additionally, IAAC requires accredited pilot schools to implement psychometric and/or skill assessment prior to enrollment that determines better student outcomes, a measurable data point for the FAA. FSANA fully supports the pre-screening process for all career focused airman candidates.

We thank you for the opportunity to have input into the FAA Part 141 Modernization project and we look forward to the evolution of an improved Part 141 that will enhance airman safety, quality, efficiency and outcomes which will impact the Ab Initio flight training industry.

Sincerely,

Robert Rockmaker
President & CEO
FSANA