

FSANA  
FAR Part 141 Review

Presented to

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Federal Aviation Administration

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On July 18, 2023, FSANA held a meeting with stakeholders and FSANA board members at the Hyatt Regency, DFW Airport. All registered attendees were given an agenda prior to and at the meeting for discussion topics. There were 36 attendees.

After introductions and a review of the agenda, each attendee was allowed 1-2 minutes to share their areas of concern with daily operations within their flight school. We referred to this as a Lightning Round of Inputs of “heavy lift” items. The consolidated list follows:

1. Challenge to secure Self-Examining Authority (SEA), FSDO’s simply say no because of priority to the 121’s.
2. Lack of standardization between FSDO’s, POI’s, PMI’s, ASI’s. Inconsistent interpretation of the FARS.
3. FAA-FSDO lacks staff, timely responses, excessive turnaround time for any 141 submissions.
4. DPE issues, overall lack of DPE’s, especially in specialty areas, exorbitant pricing, time frames for testing.
5. Standardize and reduce time frame for Check Instructors.
6. Part 141 Air Agency Certificates should not expire.
7. Part 141 Aircraft certification should be automatic on a provisional basis.
8. Create a standalone centralized Part 141 office.
9. PSI monopoly has caused significant hardship, both for students and school operators.
10. Where is the FAA at with respect to ODA?

Recommendations as agreed by stakeholders and FSANA as highlighted below:

1. **141.9 and Subpart D Examining Authority 141.63 thru 141.67**  
Recommendation: 141.63 (a)(3) amend to read “at least 12 months”.  
Recommendation: 141.63 (5) (ii) amend to read “maintain the 10 students at 80% first time pass rate”.
2. **141 Subpart A 141.13(b)**  
Recommendation: Remove “Application for the issuance or amendment of a certificate or rating must be accompanied by two copies of each proposed training course curriculum for which approval is sought”.
3. **141 Subpart A 141.17 Requirements for a pilot school certificate.**  
Recommendation: Certificate should NOT expire with the exception of a surrender or an action against the school

**4. 141 Subpart A 141.21 Inspections.**

Recommendation: ADD "School will be notified in writing at least 30 days in advance of impending inspection and allowed an option to reschedule as a result of staffing commitments, unless there is an impending safety matter or as ordered by the Administrator.

**5. 141 Subpart A 141.25 Business office and operations base.**

Recommendation: ADD "once the FAA is notified of any changes, the FAA will acknowledge the school's communication within 14 business days.

**6. 141 Subpart A 141.27 Renewal of certificates and ratings.**

Recommendation: Change (b)(3) to read 60 days as opposed to 180 days as a result of the near immeasurable amount of time for the FSDO to respond.

**7. 141 Subpart B 141.34 (a) Employment of Former FAA Employees,**

Recommendation: Change requirement of 2 years to 1 year.

**8. 141 Subpart B 141.35 Chief instructor qualifications.**

(4) Pass a proficiency test on instructional skills and ability to train students on the flight procedures and maneuvers appropriate to the course;

Recommendation: Since the Chief Instructor passes the proficiency test, drop the 1000 hour requirement.

(6) (b) For a course of training leading to the issuance of a recreational or private pilot certificate or rating, a chief instructor must have:

Recommendation: Since the Chief Instructor passes the proficiency test, drop the 1000 hour requirement.

(2) (c) For a course of training leading to the issuance of an instrument rating or a rating with instrument privileges, a chief instructor must have:

Recommendation: Since the Chief Instructor passes the proficiency test, drop the 1000 hour requirement.

(3) (d) For a course of training other than one leading to the issuance of a recreational or private pilot certificate or rating, or an instrument rating or a rating with instrument privileges, a chief instructor must have:

Recommendation: Since the Chief Instructor passes the proficiency test, drop the 2000 hour requirement.

**9. 141.36 Subpart B Assistant chief instructor qualifications.**

Recommendation: Change all 500 hour requirements to 300 hours.

**10. 141.37 Subpart B Check instructor qualifications.**

Recommendation: Allow check instructor to perform duties with basic med.

**11. 141.38 Subpart B Airports.**

Recommendation: Remove 1-2 under (d) traffic direction.

**12. 141.39 Aircraft.**

Recommendation: Aircraft certification should be automatic on a provisional basis.

**13. 141.43 Subpart B Pilot briefing areas.**

Recommend: (3) remove requirement to have telephone landline.

**14. 141.53 Subpart C Approval procedures for a training course: General.**

Recommendation: (b)(3) Remove requirement to submit courses in duplicate since they are submitted electronically.

**15. 141.101 Training records.**

(3)(c) Change Chief Instructor to Certificate Administrator.

**16. Add to Part 141**

Part 141 does not offer an option for a deviation unlike Part 119.71. The new deviation language would permit a certificate holder to employ a person who does not meet the appropriate airmen experience requirements, managerial experience requirements, or supervisory experience requirements of this section if the Manager of the Air Transport Division, AFS-200, or the Manager of the Aircraft Maintenance Division, AFS-300, as appropriate find the person has comparable experience, and can effectively perform the functions associated with the position in accordance with the requirements of this chapter and the procedures outlined in the certificate holder's manual. The Administrator may, at any time, terminate any grant of deviation authority issued under this paragraph.