



August 5, 2015

Standard Occupational Classification Policy Committee
Bureau of Labor Statistics, Suite 2135
2 Massachusetts Avenue NE
Washington DC 20212

Re: Comments for the 2018 SOC Revision
OMB-2014-0005-0001

Dear Standard Occupational Classification Policy Committee Members:

On June 4, 2015, a minority group of aviation special interests led by the Aviation Technician Education Council (ATEC) proposed changes to the Standard Occupational Classifications for the aviation industry. While there is some logic to their proposal to reinstate some of the changes made during the 1998 SOC Revision regarding the aviation maintenance occupations, the proposed elimination of the detailed occupation "49-2091 Avionics Technicians" is illogical and unsupported. The Aircraft Electronics Association, which represents tens of thousands of avionics technicians working under the certification of an FAA Part 145 Repair Station, oppose the elimination of this valuable and critical occupational data and request that the current information regarding 49-2091 Avionics Technicians be retained.

While the certification information suggested by ATEC does enhance occupational information, it is not in and of itself an occupation as the petitioners suggest. A recent search for employment opportunities indicated a partial list of occupational differentiations for Aircraft Sheet Metal Technician, Aviation Turbine Engine Repair and Overhaul Technician, Avionics Technician, Aviation Pneumatic Bench Technician, Aviation Welder, and Maintenance Programs Technician. While each of these occupations had varying qualification requirements, including an FAA certification, the certification did not define the occupation.

From the petitioners' own comments:

While the FAA tracks mechanic and repairmen certificates, the figures are not indicative of employment or career choices. As of December 31, 2014, FAA reported that it registered 341,409 mechanic certificates and 39,566 repairmen certificates. However, as highlighted by GAO, without a separate occupational classification for certificated mechanics and repairmen, the FAA numbers cannot be used for workforce development or tracking. The employment of certificated individuals is unknown and many certificate holders work outside the aviation industry.

A 2014 study by the Aeronautical Repair Station Association and the Aviation Technician Education Council fought similar headwinds investigating trends in the civil aviation technical workforce. Data limitations and the lack of adequate tracking mechanisms resulted in an inability to substantively analyze developments in employment and forecast needs. The report highlights the challenges facing aviation firms seeking to attract and retain technically skilled workers, which makes the need for accurate data pressing.

[G]iven the strong demand for technical skill sets, there is increasing competition among industries. Therefore, students are completing the aviation maintenance programs but electing to take jobs in other industries where wage or opportunity is greater. This is made possible by a desirable and transferable skill set.

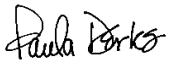
We agree that more information is necessary to adequately capture the technical trades of aircraft and avionics maintenance. It is interesting that the petitioners focus on one facet of the occupation as if that element solely defines the entire spectrum of aviation maintenance specialties. As an example, the FAA issues a mechanic certificate with two occupational ratings: airframe and power plant. These occupational ratings would better define the occupational skills rather than a simple “return to service” as suggested by the petitioners. Clearly, the petitioners either do not fully understand the purpose and benefit of the Standard Occupational Classification or is intending to track the data in some other way to support their own special interests.

Either way, grouping all aviation maintenance specialties and defining them by their certification characteristics will not enhance the overall description of aviation maintenance occupations. We disagree with the petitioners’ request as their proposal leaves out the broad range of aviation specialties that deserve classification, e.g. avionics technicians, aviation cabinet makers, aircraft painters, aviation composites technicians.

While the tracking of FAA certification information may validate employment statistics, it does nothing to define the occupation of the certificate holders. It is possible for occupational data to be enhanced by the tracking of certificated and non-certificated technicians; however, we stress—the certification is NOT the occupation, the aviation maintenance specialization is the occupation.

We respectfully request that the 49-2091 Avionics Technicians occupation information be retained as is so the aircraft avionics occupation will continue to be professionally and adequately represented.

Sincerely,



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About the AEA

Founded in 1957, the Aircraft Electronics Association represents nearly 1,300 member companies employing thousands of avionics professionals in 43 countries, including government-certified international repair stations specializing in maintenance, repair and installation of avionics and electronic systems in general aviation aircraft.

The AEA membership also includes manufacturers of avionics equipment, instrument repair facilities, instrument manufacturers, airframe manufacturers, test equipment manufacturers, major distributors, engineers and educational institutions.