U.S. Department
of Transportation
**Federal Aviation
Administration**

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

NOV 19 2010

Donald Stark
Airframe & Powerplant Coordinator
Sinclair Community College
444 West Third Street
Dayton, OH 45402-1460

Dear Mr. Stark:

This letter responds to the request for a legal interpretation that you mailed to this office on May 18, 2010. Specifically, you have asked whether you may instruct on diesel engines that are type certificated as reciprocating engines as part of an approved curriculum under 14 C.F.R. part 147, Appendix D.

Section 147.21 outlines the general curriculum requirements for an aviation maintenance technician school (AMTS). The approved "curriculum must cover the subjects and items prescribed in Appendixes B, C, or D, as applicable." 14 C.F.R. § 147.21(c). Appendix D sets forth the required powerplant curriculum subjects which include powerplant theory and maintenance for reciprocating engines. Although Appendix D does not specifically list diesel engines, a diesel engine, as a reciprocating engine, would be a proper subject for instruction under the Appendix.

We note that, notwithstanding the fact that a diesel engine may be included in the instruction of reciprocating engines, a school's curriculum must ultimately be approved by the Principal Maintenance Inspector, who is responsible for determining whether a curriculum will qualify "students to perform the duties of a mechanic for a particular rating or ratings." 14 C.F.R. § 147.21(a). The FAA has issued an advisory circular that provides additional guidance regarding the certification requirements for an AMTS including curriculum development. AC 174-3A, Certification and Operation of Aviation Maintenance Technician Schools, January 18, 2005. This document is available at http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/list/AC%20147-3A/$FILE/AC%20147-3A.pdf.

This response was prepared by Anne Moore, an Attorney in the Regulations Division of the Office of the Chief Counsel, and coordinated with the Aircraft Maintenance Division of Flight Standards Service. We hope this response has been helpful to you. If you have additional questions regarding this matter, please contact us at your convenience at (202) 267-3073.

Sincerely,

Michael Chase

for Rebecca B. MacPherson
Assistant Chief Counsel, Regulations Division