



March 3, 2011

Van Kerns
Manager, Regulatory Support Division, AFS-600
Federal Aviation Administration
FAA Mike Monroney Aeronautical Center
6500 S. MacArthur Blvd.
Oklahoma City, OK 73169

Dear Mr. Kerns,

Aircraft Owners and Pilots Association (AOPA) and National Association of Flight Instructors (NAFI), among other groups involved in aviation training have recently been alerted to an unannounced, significant change in the focus areas in the Fundamentals of Instruction (FOI), Airline Transport Pilot (ATP) and Flight Engineer (FE) knowledge test question banks. Whatever question bank changes were put into effect last week resulted in a dramatic change in the failure rate; more than quadruple the failure rate prior to the switch. Although AOPA and NAFI are not opposed to changes in the test bank, we are opposed to changes in focus areas being made without proper notification to the individuals conducting and receiving training in preparation for these exams. Coordination between FAA and industry is crucial to effective teaching of relevant material. Unannounced changes in evaluation standards accomplishes nothing for learning; it only results in increased student failures, lost time, travel expense and an extra \$140 - \$150 paid by the students to retake the exam.

AOPA and NAFI request that the test bank be reverted back to the questions in place prior to the recent update, that students who failed the exam since the changeover be allowed to retest and have the initial failure expunged from their record. We believe that prior to any further changes to knowledge test banks, the FAA should coordinate with industry. Changes in focus areas and methods of instruction need time to be implemented before significant changes to the evaluation takes place.

Ensuring that pilots have the required knowledge and skills for safe operation of their aircraft is crucial to improving the general aviation accident rate. The aviation industry represents a somewhat unique training environment in that training and testing are not provided by the same entities. As a result, close cooperation between the FAA and the flight training providers is required. The FAA must set testing standards which effectively verifies the students' understanding of safety critical material. Flight and ground instructors must ensure that required knowledge and skills are effectively communicated to the

student, that they are safe, competent pilots and also that they are prepared for the FAA exams both knowledge and practical. In order for an instructor to teach the material effectively and to evaluate their students prior to any exam, they must have a good understanding of the expectations set forth by the FAA. Additionally, if a student fails an exam, the instructor must understand where the knowledge deficiencies are so that they provide retraining and ensure that the knowledge area is thoroughly understood before signing the student off for a retest.

Practical Test Standards lay out very specific skills and tolerances for the practical test. The Knowledge Test Guide on the other hand provides information on the logistics of taking the knowledge exam mainly; knowledge test eligibility requirements, test registration, retesting procedures, etc. The small amount of information provided on actual content is extremely broad in nature. In the FOI knowledge test guide for example, the guidance provided on “knowledge areas on the tests” states (in its entirety):

“Flight and ground instructor knowledge tests are comprehensive because they must test your knowledge in many subject areas. These include all aeronautical knowledge areas required for a private and commercial pilot certificate, as well as those required for a flight or ground instructor certificate. When applying for any flight or ground instructor knowledge test, you should review the appropriate sections of 14 CFR Part 61 for specific knowledge areas on each test.

Flight instructors should be knowledgeable of not only what to do and how to do it, but also why a maneuver is performed and what common errors result if the maneuver or procedure is not performed properly. Ground instructors should also be knowledgeable of all subjects; however, they would not be expected to understand evaluating pilot performance of maneuvers and analyzing common errors.

It is generally accepted that a pilot with much knowledge, but little skill, is not adequately equipped to fly an aircraft. Neither is the pilot who is skillful in the manipulative techniques of flying, but lacks aviation knowledge.”

It was indicated in a phone call last week that the changes in the FOI exam took place in order to bring the questions in line with the newly revised Flight Instructor Handbook. That handbook contains 228 pages of information. It is unlikely that any given instructor candidate could possibly retain all of the information contained within the handbook or be able to anticipate the wide array of questions that could be developed from the material. It would be even more unlikely that students testing for a private, instrument or commercial exam where they are responsible for information found in several books including the FARs, AIM, Private Pilot Handbook, etc. could retain all of the information contained within those books. The number of questions that could be developed from such broad material is unlimited.

Flight instructors and test prep providers attempt to provide the student with basic target areas to focus on which will ensure that the students retain the most important lessons and are prepared for the FAA knowledge exam. However with no detailed expectations set by the FAA, this is difficult task for a flight instructor to accomplish. Knowledge test preparation guides have filled the gap, using the experiences of pilots who have taken the exam to set the expectations for new pilots.

Like you, we believe that the knowledge test should be an effective measurement of knowledge, not just a test of rote memory. We would like to see students come out of flight training with the fundamental knowledge needed to operate their aircraft safely and, in the case of the Flight Instructor, to teach effectively. This may mean a full systematic change requiring cooperation of the FAA and industry. Simply changing the test bank will not positively change the quality of training or retention of knowledge for the student. Without coordinating with the instructors providing the training, changes to the test bank will only effect changes to the failure rate - not the knowledge conveyed to the students. This is most unfair to the students who end up with a failure on their record and have to pay an additional \$140 - \$150 to take a second exam.

As this recent change in the question bank has represented such a dramatic change in the failure rate, we would appreciate a timely response to our request.

Sincerely,



Kristine Hartzell
Manager, Regulatory Affairs
AOPA



Jason Blair
Executive Director
NAFI