

December 14, 2022

Janet Garcia
President
PSI
611 N. Brand Blvd., 10th Floor
Glendale, CA 91203

Dear Ms. Garcia:

On behalf of the entire third-party FAA knowledge testing community, who provide invaluable and specialized testing services to pilots, mechanics, parachute riggers, flight engineers, dispatchers, and remote pilots across the entire United States while providing the highest level of customer service, the undersigned respectfully request PSI delay its change in fee structure to third-party FAA knowledge test providers, and reconsider test download fees for the Mechanic Test Generator (MTG).

In a letter dated November 18, 2022, third-party providers of FAA knowledge tests were notified of a change in fee structure that would significantly reduce the current reimbursement rate by more than 65% for most exams, effective January 1, 2023. This significant fee reduction, which provided just over a month's notice at the end of the year, will create significant hardships not only to third-party FAA knowledge test providers, but the entire aviation industry.

To date, of the 207,000 FAA knowledge tests completed in 2022 throughout the United States, a significant majority were administered by third-party FAA knowledge test providers. However, with ongoing support issues and after this recent fee structure change announcement, the ability for these third-party providers to support and offer FAA knowledge exams at the highest levels of customer service will become unsustainable. This significant fee reduction of over 65% will create substantial hardships that no organization can sustain, and for many, the only remaining option will be to stop providing this important service.

We cannot overstate the negative impact of third-party providers closing due to this decrease in fee structure. This network of third-party providers has several decades of knowledge, experience, and customer service in proctoring FAA knowledge tests to the 720,000 certificated pilots, 313,000 mechanics, 7,000 parachute riggers, 28,000 flight engineers, 23,000 dispatchers, 254,000 remote pilots, and the countless number who are and will be entering the aviation industry. If a portion of those providers close, significant burdens will be placed on those individuals who no longer have access to one of these third-party test centers.

The time to schedule and travel to the closest test center will increase, as will the time to complete an applicant's overall training. Economic costs, such as transportation, will equally increase. In at least one case, there remains one testing center in a 300-mile radius. In addition to the negative impact to applicants, those testing centers that decide to continue providing tests may not have the resources, infrastructure, and workforce to handle an increase in demand. In a time of significant pilot and mechanic demand, burdens such as these will only create further workforce challenges.

Due to the limited amount of notice to many of the third-party providers of the impending fee change, the undersigned respectfully request PSI delay the January 1, 2023 fee change to allow for discussion

and collaboration with the third-party FAA knowledge testing community. For similar reasons as stated above, we also ask that PSI reconsider or delay new fees it plans to assess Designated Mechanic Examiners starting Aug. 1, 2023 for MTG oral and practical test downloads.

We appreciate PSI's willingness to speak and work with representatives of the undersigned to date, and we look forward to continued work together to ensure FAA knowledge exams remain accessible to the aviation community.

Sincerely,

Aircraft Owners and Pilots Association
ATP Flight School
Aviation Supplies & Academics
Aviation Technician Education Council
Embry-Riddle Aeronautical University
Experimental Aircraft Association
Flight School Association of North America
National Association of Flight Instructors
Society of Aviation and Flight Educators
University of North Dakota

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