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Administrator Chris Rocheleau

Federal Aviation Administration
800 Independence Avenue NW
Washington, DC 20591

Subject: Urgent Regulatory Reform to Unlock Military Talent and Solve the Aviation Workforce Crisis

Dear Administrator Rocheleau,

This is not a request for funding. America is facing a national aviation maintenance crisis. Thousands of highly trained military aviation mechanics are ready to serve the civilian sector, but FAA bureaucracy prevents them from doing so. This is a call to modernize certification policy, honor their service, and fill critical workforce gaps with proven professionals.

We are seeking **regulatory reform to benefit our military veterans** and address the urgent workforce challenges facing the U.S. aviation industry. The **industry is experiencing a severe shortage of certified Airframe & Powerplant (A&P) mechanics, jeopardizing both safety and operational efficiency**. While the FAA has made commendable efforts to address this issue through certification reform, apprenticeship programs, and expanded training pipelines, **an immediate and largely untapped solution exists: leveraging the thousands of highly skilled military aviation mechanics who transition out of service each year**.

These individuals have already undergone rigorous, taxpayer-funded training and have accumulated thousands of hours of hands-on experience maintaining some of the world's most advanced aircraft. Yet, despite often exceeding the experience levels of civilian A&P school graduates, **they encounter unnecessary bureaucratic barriers to FAA certification**. At Warriors in Need (WIN), a Marine-run,



veteran-led nonprofit, we witness firsthand how these **roadblocks slow workforce integration and underutilize highly skilled, government-trained professionals.**

We urge the FAA and DOT to implement a **direct certification pathway for military aviation mechanics** to ensure taxpayer investment in military training is maximized while rapidly filling workforce gaps. Additionally, establishing a structured transition process for military mechanics would serve as a valuable recruitment tool for the U.S. military by providing a clear, accelerated path to long-term aviation careers.

PROBLEM	SOLUTION	IMPACT
Aviation Technician Shortage: Boeing projects an increased need for 123,000 maintenance technicians in North America over the next 20 years, averaging 6,150 annually(a). ATEC estimates the current shortage will grow to 20%, adding an additional need of 25,000 technicians by 2028, bringing the total annual need to over 12,000(b). The FAA issues an average of 7,433 certificates annually(d), resulting in a shortfall of nearly 4,600 per year.	Streamline military-to-civilian transition by allowing veterans to test directly with validated MOS + DD214 , and bypassing redundant oral and practical exams.	Immediate integration of thousands of qualified military-trained mechanics into the aviation workforce, reducing the shortage.
Veteran Underutilization: Approximately 11% (22,000) of the 200,000(c) veterans transitioning annually have aviation maintenance experience. However, only 1,500 (or 7%)(b) earn certifications and enter civilian aviation roles each year.	Accelerate veteran transition by recognizing military experience and expediting the certification process by removing bureaucratic obstacles and unnecessary barriers.	Maximized workforce potential by reducing barriers, leading to faster employment for qualified veterans.
PARITY MODEL Align military mechanic certification process with the existing and direct military-to-ATP path for pilots.		

CITATIONS:

- a. Boeing Pilot & Technician Outlook, 2024-2043
- b. Aviation Technician Education Council (ATEC) Pipeline Report, 2023
- c. U.S. Department of Veterans Affairs Transition Assistance Program (VA TAP), 2023
- d. FAA U.S. 2024 Active Civil Airmen Statistics Table 17

Aligning with DOT & FAA Priorities

1. Certification Reform: Streamlining the FAA's Certification Process

- **Problem:** The current FAA process requires military mechanics to undergo unnecessary testing, including oral and practical exams, despite their training records already verifying competency.



- **Solution:** Military mechanics should be permitted to take the General, Airframe, and Powerplant exams simultaneously and receive automatic credit for their documented practical experience.

2. Addressing the Aging Workforce: Fast-Tracking Skilled Replacements

- **Problem:** Nearly **40%** of today's AMTs will reach retirement age within the next decade (*Aviation Technician Education Council, 2023*). The FAA must act swiftly to replace them with qualified professionals
- **Solution:** Military-trained mechanics represent an immediate, job-ready workforce. Recognizing their training and expediting certification would bring skilled professionals into the industry without unnecessary delays.

3. Creating Parity Between Pilots and Mechanics

- **Problem:** Military pilots can transition directly into civilian aviation through FAA testing for Instrument Ratings, Commercial Pilot Certificates, and Airline Transport Pilot certifications. Their military flight hours and experience are recognized, ensuring they do not start from scratch. **Military mechanics, however, face excessive certification barriers despite comparable real-world expertise.** They must undergo redundant testing and training, while civilian Airframe and Power-Plant graduates—many with minimal hands-on experience—face fewer obstacles.
- **Solution:**
 - Align military mechanic certification with the existing process for military pilots.
 - Allow direct testing for General, Airframe, and Powerplant exams without delays.
 - Remove certification barriers for military mechanics by recognizing real-world experience and eliminating redundant requirements like oral and practical testing.

By implementing these changes, the FAA would correct a longstanding inequity between pilots and mechanics while accelerating the transition of skilled military personnel into the civilian workforce—helping to address the nationwide shortage of aviation mechanics **immediately**.

Call to Action: Implement These Critical Reforms

We respectfully urge the DOT and FAA to:

1. **Remove unnecessary oral and practical testing for military-trained mechanics with verified experience.**



A. Proposed Amendment to 14 CFR § 65.79:

- (a) Each applicant for a mechanic certificate or rating must demonstrate their ability to perform assigned tasks by passing oral and practical tests appropriate to the rating sought, **except as provided in paragraph (b) of this section.**
- **(b) Applicants who have successfully completed at least 30 months of practical experience in aviation maintenance, as documented and verified by official training and qualification records, are deemed to have met the skill requirements of this section and are not required to take the oral and practical tests.**

2. Allow military mechanics to test for General, Airframe, and Powerplant certifications simultaneously.

A. Proposed Amendment-Addition to FAA Order 8900.1

- Amend Figure 5-138 Tables 1-5 column-Possible Creditable Experience, recognizing **ALL** MOS codes as referenced are eligible for testing for **BOTH** Airframe and Powerplant (A&P) certification exams upon demonstrating 30 months of practical aviation maintenance experience as documented in official military records and verified by a military FAA liaison.

B. Proposed Amendment-Addition to FAA Order 8900.1 Volume 5 Section 2 § 5-1134 A1

- **Applicants who have successfully completed a minimum of 30 months of practical experience in aviation maintenance, as documented by official training records, certification letters, certificates and experience shall be considered to have met the skill requirements for this section and are exempt from taking the oral and practical tests. For applicants with unverified practical documentation, FAA inspectors should refer to Section 1134D for evaluation guidance.**

3. Partner with WIN and other Veteran Support Organizations empowering veterans and ensuring a successful transition.

Warriors in Need (WIN) is a nonprofit dedicated to helping veterans successfully transition to civilian careers. WIN provides tools, mentorship, résumé support, and professional network connections to ensure veterans find meaningful employment in industries where their military experience is valued. By partnering with WIN, the FAA can establish an efficient certification review process and offer targeted training to close any knowledge gaps, further strengthening the aviation workforce.



Conclusion

The United States has already invested in training veterans—it is time to ensure that investment is fully utilized. A streamlined certification pathway will not only benefit veterans but also fortify America's aviation industry by getting skilled mechanics with hands-on experience into the workforce faster.

As a valuable side benefit, these reforms can also help address challenges such as veteran suicide and homelessness. By creating a seamless transition from military service to civilian aviation careers, this initiative eliminates the critical 6-9 month gap where many veterans struggle with unemployment and instability. Additionally, careers in aviation provide structure, purpose, and financial stability, while also ensuring participation in federal drug and alcohol programs—promoting a healthy, safe, and sustainable lifestyle for those who have served our country.

We welcome the opportunity to meet with your team to discuss how we can implement these solutions efficiently. Thank you for your leadership in supporting our military veterans and ensuring the strength of America's aviation workforce.

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Sincerely,

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