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The UPDATE Report

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TO THE ASA-100 STANDARD AND THE FAA'S AC 00-56A VOLUNTARY INDUSTRY DISTRIBUTOR ACCREDITATION PROGRAM

ASA
AVIATION SUPPLIERS ASSOCIATION

REGULATORY UPDATE

New Life Limits on Aircraft Could Affect the Value of Surplus Inventories!

The FAA has proposed a rule that would establish life-limits on existing aircraft, thus effectively removing many older aircraft from the civil aviation fleet. This could represent a tremendous impact on the value of existing stores of inventory for transport category aircraft.

The proposed rule would require type certificate holders and STC holders to evaluate the structural configurations of their large Part 25 aircraft to determine when widespread fatigue damage is likely to occur. The rule is limited to Part 25 aircraft with maximum gross take-off weights exceeding 75,000 pounds (thus it excludes certain regional jets). The manufacturers will then be required to establish operational limits on their aircraft, which will be published in the Airworthiness Limitations Sections for the aircraft (they will be life-limits on the airframes).

The new life-limits must be set at a point at which it is known, through test and analysis, that widespread fatigue damage will not occur. The rule could represent a significant new engineering burden on those who manufacture and alter aircraft, with a very short timeframe for compliance – under the proposal, all life-limits must be established by December 18, 2007. This short time frame may force type certificate holders to adopt even more conservative life-limits than they might have adopted with more time and resources to engage in testing for existing models. The FAA has proposed design service goals in the proposed rule, although these proposals are illustrative only and would likely not be binding on the determination of the manufacturer.

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INSIDE:

THE UPDATE REPORT

is a monthly newsletter of the Aviation Suppliers Association. Questions and/or comments should be addressed to:

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THE UPDATE REPORT

provides timely information to help Association members and readers keep abreast of the changes within the aviation supply industry.

THE UPDATE REPORT

is just one of the many benefits that the Aviation Suppliers Association offers members. For information on ASA-100, the ASA Accreditation Program, Conferences, Workshops, FAA guidance like Advisory Circulars, Industry Memos or services and benefits, contact the Association.

THE UPDATE REPORT STAFF

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MESSAGE FROM ASA'S PRESIDENT

Dear Members,

So much has happened since the beginning of the year that has the potential of changing the future landscape of parts and parts distribution. At the MRO Convention there was considerable discussion of how Pratt & Whitney's endeavor into PMA market of GE engines would impact the engine market and more over the PMA market in general. Short term, the news definitely elevated PMAs and probably provided additional credibility to using PMAs. The bigger issue for distributors is how the new PMAs will impact the engine spare parts market from a pricing standpoint.

Days after the MRO Convention, Boeing announced its planned acquisition of Aviall. ASA recently held its quality committee meeting at the Aviall facility in Dallas, and committee members enjoyed a tour of the facility. Aviall operational systems were impressive to say the least. According to an article in Aviation Week & Space Technology, Aviall controls 5% of the airline industry's $25 billion in annual MRO spending. Aviall strengthens Boeing's IMM Program and also provides additional exposure in the military market.

Of course, the question from the membership at large is how will this impact the future parts distribution market? There is no question that there will be an impact. However, we can only speculate on the extent of that impact, while details of the future operations and Aviall's integration with Boeing remain unclear.

We have also seen recent acquisitions of distributors and also large financing opportunities for distributors. This brings greater opportunity for all companies, but is this a short term phenomenon or is the industry financially strong?

The general session at the ASA Annual Conference has industry leaders discussing the above issues and more. Hal Chrisman, AeroStrategy, will be discussing the MRO Supply Chain; John Heimlich, ATA will be discussing the state of the airline industry and Dave Doll will be addressing PMAs. These sessions are designed to provide you with the needed industry intel to make appropriate decisions for your company. I look forward to more thought-provoking discussions on these major industry changes .

Take Care,
Michele Dickstein

LIST OF ADVERTISERS

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As an example, the design service goal for a Boeing 747 is 20,000 flight cycles. The new A380 is expected to have a design service goal of 19,000 flight cycles, 140,000 flight hours or 25 years, whichever comes first. The FAA has also suggested that manufacturers could establish an extended service goal of 25% above the design service goal, and this extended goal could be used if the operator adheres to a specialized maintenance scheme designed to prevent widespread fatigue damage (an aging aircraft program).

This proposed rule is a dream-come-true for airframe manufacturer lawyers. It would permit manufacturers to limit their own liability for the aircraft by life-limiting the aircraft in a way that would take it out of service. It would make perfect sense for manufacturers to establish conservative limits for out-of-production aircraft. In a product liability case, the manufacturer could then claim that aircraft flown beyond those conservative limits were operated outside the scope of the manufacturer's intended use, and therefore, the manufacturer should not reasonably be held liable for such unintended use beyond the regulatory limits.

Manufacturers would be likely to establish more reasonable life-limits on in-production models, because an extremely conservative life-limit could have an adverse affect on sales of the aircraft. Nonetheless, it could serve a manufacturer's long-term interests to be somewhat conservative in setting airframe life-limits because it forces the industry to buy more new aircraft to meet the industry's growing needs – airframe manufacturers may find that the sales competition from existing used aircraft is diminished greatly by this proposal.

Someone could apply for an extended life-limit based on appropriate engineering (approved in cooperation with the Aircraft Certification Office via the same mechanism that allows the approval of aftermarket repairs); however, that extension of life would likely impose on the life-extender a tremendous amount of product liability that currently rests (under current law) on the shoulders of the type certificate holder. The engineering associated with such an extension could be costly, and the fact that the Aircraft Certification Service is trying to retreat from all new projects in order to focus their miniscule resources on their core mission means that FAA resources to approve such a change in life-limits might not be available on a practical basis.

The rule requires manufacturers to apply life-limits to current-production airframes as well as existing airframes, although the previously-mentioned realities of being able to market current-production airframes will require the manufacturers to devote substantial resources to current-production aircraft and develop reasonably marketable life-limits. These life-limits will still affect the total life of the aircraft and the extended service life in the secondary market.

The rule will also impose on holders of STCs a requirement to review and establish criteria designed to preclude widespread fatigue damage by December 18, 2010. This could give STC holders an opportunity to effectively ground aircraft with their STCs and claim immunity from liability for the grounding based on the argument that the action was mandated by this rule.

All of this spells potential trouble for the people who make their living keeping these aircraft in the air. Surplus parts distributors could be hit very hard by forced retirements of aircraft that occur after December 18, 2007.

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Analysis Targets for ASA Members

ASA members will want to address both the substance of the rule and the cost benefit analysis of the rule.

In the substance, ASA members may wish to ask the FAA to impose reasonable limits on the life-limits that may be imposed. There is a potential to remove safe aircraft from operation by virtue of these new life-limits, and this potential result should be avoided.

Another option for the FAA to consider – an option that was not among those considered by the FAA – is to require manufacturers to develop aging aircraft maintenance programs that would permit aircraft to be safely maintained, inspected and flown. Current maintenance practices involve significant replacement of parts at the heavy check phase for these aircraft. The FAA's proposal imposes a burden on manufacturers to establish life-limits on aircraft and then a burden on the rest of the industry to comply with these newly-established life-limits. The financial burden on the rest of the industry will be tremendous. In many cases, aircraft that have been well-maintained and are safe and airworthy will be removed from service. They do not need to be removed. Where an operator or maintainer has established a sound mechanism for maintaining the airworthiness of the aircraft, there is no sound reason for the manufacturer's life-limit to ground that aircraft.

ASA members should also ask the FAA to layout the mechanism by which someone may apply for an extension of the life limits where the manufacturer's has established a life-limit that is too conservative. The FAA needs to specifically endorse such an action as a remedy for a life-limit that is too conservative. Right now, this option is only listed under the Paperwork Reduction Act provisions, but it exists nowhere in the regulation itself.

With respect to the Paperwork Reduction Act provisions, the FAA has made estimates on the amount of reporting and recordkeeping time associated with the life-limit and life-extension programs. The total annual cost is estimated to be $118,000. This seems exceedingly low – in fact this figure would seem low if it were proposed as the annual cost for a single model aircraft – not for the entire US fleet. ASA members who anticipate needing to develop life-extension proposals for airframes should develop reasonable estimates for the cost of such an operation. ASA members who will need to develop widespread fatigue data for their STCs or other alterations will also want to develop reasonable estimates for the recordkeeping and reporting cost of such actions.

ASA members may wish to point out to the FAA that to the extent that this rulemaking activity could have a tremendous affect on property value. It will diminish the value of existing aircraft and aircraft parts inventories, as well as the businesses that sell parts and maintain aircraft. The FAA obviously does not intend to pay compensation for such diminution in value. Therefore the FAA must justify this tremendous cost with a distinct safety benefit. The FAA throws out words like 'widespread fatigue damage' and 'aging aircraft,' but the proposal does not explain how the FAA arrives at its estimate that the value of this proposal, over 20 years, will be about $809 million.

In the cost-benefit analysis section, the proposed rule does not list the cost to distributors who are relying on being able to make parts sales to support the aging aircraft. Any member who can provide data to support estimates of such costs should provide that information to ASA so we can provide better information about costs of the rule to the FAA. It is important that the FAA understand the potential cost of such a rule.

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The cost-benefit analysis also seems to fail to address the value of the aircraft that will have to be retired early because they have reached their life-limits.

Finally, the cost benefit analysis fails to account for the maintenance work that US companies will lose because new aircraft require significantly less maintenance than aging aircraft (both heavy maintenance and related component work).

Submit Your Comments

Comments on the rule that asks design approval holders to impose limits on operators' use of the aircraft are due by July 17, 2006 and should be submitted electronically at http://dms.dot.gov. Make reference to Docket Number FAA-2006- 24281. Please provide ASA with a copy of your comments for our records.

A copy of the proposed rule requiring design approval holders to establish operating limits on their designs is available at:
http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2006_register&docid=fr18ap06-22

Getting 8130-3 Tags: the ASA Exemption

Last month we cheered when the so-called "ASA Exemption" was issued. The exemption allows accredited ASA members to apply for export 8130-3 tags for class III products. Before this exemption, export 8130-3 tags were unavailable to most of ASA's members, because only manufacturers were eligible to apply for the tags.

Part of the Petition for Exemption that ASA filed asked the FAA to issue guidance permitting Designated Airworthiness Representatives (DARs) to issue the 8130-3 tags anticipated under the ASA Exemption. On May 3, the FAA issued a guidance memo authorizing certain DARs to issue such 8130-3 tags.

Unfortunately, the May 3 memo limited the scope of who can issue the class III export 8130-3 tags to only manufacturing DARs with function code 20 privileges. This is a problem because most ASA members have existing relationships with maintenance DARs, not manufacturing DARs. Most manufacturing DARs have firm relationships with manufacturing companies and do not have the spare time to issue 8130-3 tags at distributors' facilities. The total number of manufacturing DARs (about 300+) is also much less than the total number of maintenance DARs (about 700+). The result is that there are members in many parts of the country that cannot take advantage of the ASA exemption because of a lack of available manufacturing DAR resources.

We met last week with Frank Paskiewicz, Juanita Young, Mike Fradette and Tom Miller (all from the FAA's Production and Airworthiness Division, known as AIR-200) to discuss this issue. They had published the memo that limited the ASA Exemption only to manufacturing DARs. After some discussion, they agreed with ASA that there seemed to be no policy reason to exclude maintenance DARs from the privilege of issuing export 8130-3 tags for demonstrably airworthy class III products. They felt that the final decision about maintenance DARs functions should be left to the FAA's Maintenance Division (AFS-300), so a final decision was deferred to AFS-300.

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We met this week with the Acting Manager of AFS-300, Rick Domingo. We explained that maintenance DARs already issue domestic 8130-3 tags for class III products, and both domestic and export 8130-3 tags for class II products, so adding privileges for class III export tags was really just "filling in the final box on the matrix." We explained that current guidance for issuing 8130-3 airworthiness tags requires the parts to have been produced by a FAA production approval holder, so current guidance would preclude maintenance DARs from issuing 8130-3 tags without any effective controls. Domingo seemed quite receptive to the idea of maintenance DARs, but he wanted to perform some additional investigations and make some additional inquiries before making a commitment. ASA will be developing a White Paper and some sample guidance to assist him in his analysis.

For those who were counting on being able to use their local Maintenance DARs to obtain class III export 8130-3 tags for their demonstrably airworthy parts, you may have to wait just a little bit longer, but we are working toward effective Maintenance DAR privileges. In the mean time, you can still obtain either a domestic 8130-3 from a Maintenance DAR with appropriate privileges or an export 8130-3 from a Manufacturing DAR with function code 20 (assuming, of course, that the class III part is otherwise eligible for an airworthiness approval tag). A list of manufacturing DARs (and their function codes) can be found online at:
http://www.faa.gov/other_visit/aviation_industry/designees_delegations/designee_types/media/DARDirectory.pdf

Electronic Documentation: What's Happening?

Many of you have been following the development of standards associated with electronic documentation. As we reported in last month's issue, the FAA has been reviewing the proposed ATA Spec 2000 chapter 16 addition that would provide a standardized schema for transmitting airworthiness information – a schema that was specifically designed to be accessible to distributors.

In March, the idea was presented to the European authorities – many of them were reviewing it for the first time. In a follow-up meeting this month with EASA's Eric Sivel (Continuing Airworthiness Manager), Jean-Pierre Arnaud (Continuing Airworthiness Officer) and Allaert Kalshoven (Production Organisation Manager), the EASA representatives expressed strong support for our work and for the evolution toward electronic data solutions in general.

EASA expressed support for referencing industry standards like Chapter 16 of SPEC 2000 in its rules, but they explained that such standards must first be classified officially by the EU as European Norms. EASA plans to evaluate this schema to confirm that it will be both technically feasible and fully in compliance with European law (especially regarding data security and privacy).

In order for EASA to allow European companies to accept electronic airworthiness documentation from the United States, EASA will have to go through a rulemaking process. In last month's issue, we reported that the FAA is likely to delay endorsement of this electronic documentation schema until the "F" revision of Order 8130.21 (expected 2008 or 2009). In light of EASA's need to go through a rulemaking process, we must stand by our prediction that publication of explicit government support for any particular schema permitting uniformity among electronic airworthiness documentation remains several years in the future.

Special thanks from the Association go out to Jason Lewis and Brent Webb, who worked with Jason Dickstein on the Committee that helped craft the schema that will one day provide uniformity to the passage of airworthiness documentation through electronic media.

New Analysis Proposed for TC & STC Holders

If your company holds Supplemental Type Certificates (STCs), or does business with anyone that uses STCs, then you will want to pay attention to the latest series of proposed rules and policies affecting STCs.

The FAA has proposed new rules and policies related to damage tolerance analysis. Under the proposed rules, applicants for STCs will have to do additional damage tolerance analysis in order to substantiate their STC applications. More importantly, existing holders of STCs will be required to go back and perform the damage tolerance substantiation for the old STCs before the 2009 deadline. The rule also applies to type certificate holders.

What is Damage Tolerance?

Damage tolerance has to do with the structural response and integrity associated with a given damage state of a structure. Essentially, it is a calculation of the likely possible results of damage to a structure and the related failure modes. One purpose of damage tolerance is to help drive

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engineering and design practices that will result in structures that will not fail (or are less likely to fail) when subjected to the most likely permutations damage. Variables in a damage tolerance analysis include the type, extent and location of the damage. Formal use of damage tolerance engineering goes back at least to 1972, when the U.S. Air Force adopted damage tolerance as a method of fatigue substantiation. The FAA began to require damage tolerance engineering in transport category airplanes in 1978, and for transport category rotorcraft in 1989.

The FAA is currently focusing on damage tolerance for several reasons but one driver is the concern over fatigue cracking. Fatigue cracking has been a major aviation safety concern for many years, and has been a documented contributing factor to a number of accidents. The current direction of damage tolerance, however, goes far beyond merely addressing fatigue cracking.

The FAA feels that the industry has not carried out damage tolerance methods in a sufficiently comprehensive manner – this includes performing damage tolerance analysis using rigorous engineering analysis. A particular area of focus is the change in the damage tolerance analysis in a structure when the structure is subject to repair or alteration. For example, when an antenna is installed, are the doublers that are installed sufficient to return the aircraft to a condition where the damage tolerance analysis remains static, or does the new configuration change the damage tolerance features of the aircraft?

Because damage tolerance can be used to help build maintenance programs (e.g. by scheduling maintenance of an article before its damage tolerance is degraded), changes in the damage tolerance analysis that are wrought by alterations to a structure can be very important to those who create continuous airworthiness maintenance schedules.

What is the FAA Proposing?

The FAA's rulemaking proposal would require those performing repairs and alterations to better take into account the adverse effects repairs, alterations and modifications may have on fatigue cracking and the inspection of this airplane structure. It would also require "holders of design approvals" to make available to operators damage tolerance data for repairs and alterations to fatigue critical airplane structure. This is meant to support the operators' requirements under the aging aircraft rules.

Certain damage tolerance assessment are already required – for example, the changed products rule (14 C.F.R. 21.101, as amended) applied the most recent design regulations to major design changes incorporating significant changes. A structure that was not subject to damage tolerance analysis, but that is now the subject of an STC, might invoke the requirement for such analysis if the most recent regulations applying to that structure required damage tolerance analysis. Thus, the new regulations are meant to 'fill in the gaps' and require damage tolerance analysis in other instances.

Under the proposed rule, anyone who holds an STC on a Part 25 aircraft will need to analyze that STC to identify and list fatigue critical alteration structures – the proposed rule only applies to Part 25 aircraft because the related damage tolerance rules only apply to Part 25 aircraft and Part 121/129 operators (in fact, certain aircraft that are known to NOT be flown by air carriers are specifically excluded in proposed section 25.1823(h)). STC holders will have to examine existing and future STCs, existing and future non-STC alterations, and existing and future repair data associated with the alterations.

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Most of this damage tolerance information will need to be developed and submitted by June 30, 2009 under the proposed rule. The proposed rule will also require affected STC holders to submit compliance plans not later than 180 days after the effective date of the rule (whenever it becomes final). All of this is designed to support aging aircraft regulations that will be imposed on the operators in 2010.

Make Your Voice Heard

The FAA is seeking comments on the proposed damage tolerance rule by July 20, 2006. If you believe that this regulation will apply to your business, then you need to make your voice heard! Comments should be identified by Docket Number FAA-2005- 21693. They may be submitted electronically at http://dms.dot.gov. If you file comments on this rulemaking proposal, please submit a copy of them to ASA for our records.

Comments on the proposed advisory circular are due a month earlier, by June 20, 2006. They may be submitted by mail to Federal Aviation Administration, Attention: Greg Schneider, Airframe/Cabin Safety Branch, ANM-115, FAA, Transport Airplane Directorate, Aircraft Certification Service, 1601 Lind Avenue SW., Renton, WA 98055-4056.

A copy of the proposed rule requiring design approval holders to compile damage tolerance information is available on the internet at:
http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2006_register&docid=fr21ap06-14.
A copy of the availability announcement for the proposed advisory circular is available online at:
http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2006_register&docid=fr21ap06-114.

How Does the FAA Write Special Airworthiness Bulletins Against Parts?

The FAA has produced draft guidance on how to produce and publish a Special Airworthiness Information Bulletins (SAIB). This guidance is aimed at FAA employees in that it provides them guidance on how to do their jobs in publishing SAIBs, but it is being made available for public comment before it is published because it affects the way that SAIBs are written, and SAIBs, in turn, affect the commercial and safety practices of many people in the aviation industry. SAIBs can affect ASA members, in particular, because sometimes SAIBs are used to describe aircraft parts that raise safety concerns, in a manner similar to the way that Unapproved Parts Notices (UPNs) are used.

SAIBs are generally short bulletins advising the target audience about a specific safety issue. An FAA office may develop an SAIB as an information tool to alert, educate, and make recommendations to the aviation community about ways to improve the safety of a product.

SAIBs are like non-mandatory airworthiness directives. They do not reflect a serious safety issue that is likely to recur in aircraft the way that an airworthiness directive does, so the issue discussed in the SAIB is not eligible for airworthiness directive treatment. Despite the fact that SAIBs are non-mandatory, the operator industry – particular general aviation operators – takes them very seriously.

The target audience for an SAIB may be very focused or very broad. For instance, FAA may send SAIBs to owners, type clubs or user groups, fixed base operators, Part 121 and 135 operators, repair stations, parachute riggers, FAA offices (like Flight Standards District Offices) or even to foreign authorities where there is a belief that a potential safety may cross international boundaries or exist in other countries.

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A copy of the draft guidance can be found online at:
http://www.faa.gov/aircraft/draft_docs/media/SAIB ORDER March 28 2006.doc.
Comments on the document can be sent by email to Elizabeth.Bumann@faa.gov, or mailed to Elizabeth Bumann, Federal Aviation Administration, Aircraft Certification Service, AIR-140, 6500 S. MacArthur Blvd., Oklahoma City, OK 73125. The deadline for submitting comments is June 2, 2006.

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For more information and to register for Hazmat Training, please visit our
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UNAPPROVED PARTS NOTIFICATION

SUSPECTED UNAPPROVED PARTS PROGRAM OFFICE, AVS-20
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U.S. Department
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UPNs are posted on the Internet at http://www.faa.gov/avr/sups/upn.cfm

No. 2005-00187
May 8, 2006

http://www.faa.gov/aircraft/safety/programs/sups/upn/
Mailed by: FAA, AIR-140, P.O. Box 26460, Oklahoma City, OK 73125

AFFECTED PARTS

Oil coolers.

PURPOSE

The purpose of this notification is to advise all aircraft owners, operators, manufacturers, maintenance organizations, and parts suppliers and distributors regarding improper maintenance performed on air-cooled oil coolers (Part No. 50026001-1) and fuel-cooled oil coolers (Part No. 55006001-21).

BACKGROUND

Information received during a Federal Aviation Administration (FAA) suspected unapproved parts investigation revealed that Southwest Cooler Service, Inc. (Southwest), located at 3939 Platinum Way, Dallas, TX 75237, improperly maintained and approved for return to service oil coolers applicable to various types of aircraft. Southwest holds Air Agency Certificate No. TB3R861L with Accessory Class 1 (Mechanical Accessories) and Accessory Class 2 (Electric Accessories and Limited Specialized Service) ratings. The FAA has not been able to determine the number of affected parts or the exact time span the improper maintenance occurred. Discrepancies noted in Southwest's practices included, but are not limited to, the following:

- Approving for return to service oil coolers described as having been overhauled when, in fact, the coolers had not been disassembled, cleaned, inspected, repaired as necessary, and reassembled using methods, techniques, and practices acceptable to the Administrator.
- Performing modifications and repairs without using data approved by the Administrator.
- Approving for return to service air- and fuel-cooled oil coolers that had not been maintained in accordance with the current manufacturer's maintenance manual or methods otherwise acceptable to the Administrator.
- Approving for return to service oil coolers that were not repaired in accordance with the current manufacturer's maintenance manual.
- Using a contract maintenance provider, which was not identified in the repair station maintenance manual, for welding activities.
- Allowing unqualified personnel to perform nondestructive inspection, alodine application, and welding.

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The Internet Quantum module (iQ), utilizes StockMarket technology to allow customers to login to your website and view, RFQ, or purchase from your existing stock in real-time. Information such as condition, time & cycles remaining, tag info, scanned documents, delivery time and more is available to assist users in their purchasing decisions.

Max-Q
With Max-Q you get Aviation's leading Business Application, Quantum Control, implemented with the latest database technology from Oracle to provide the ultimate in database Security, Reliability, Scalability and Performance.

Shop Control
Manages the complete Component and Assembly Repair and Overhaul process. Includes real-time Cost and Schedule Management functions that put you in complete control of your shop's activity.

Manufacturing
The Manufacturing Module addresses all aspects of the manufacturing process including product lines, floor control, inspections, materials planning, purchasing and outside servicing.

Repair Orders*
Manages the preparation, pulling from inventory, shipping and receiving of components sent out for repair. The Repair Order module provides historic as well as current repair cost per component, detailed by parts, labor and miscellaneous charges.

Bar Coding
Prints bar codes and allows for the scanning of physical inventory to track and manage stock and account for all parts when shipping, receiving, etc.

Repair Manual Tracking
Tracks all publications and revision dates and review dates. Provides for manual effectivity by part, customer and ATA. Integrated with the Shop Control module providing specific manual requirements for individual work orders.

Document Imaging
Provides the ability to attach images or documents against part number, stock line, work order, and company.

Rental and Leasing
The Rental and Leasing module has the versatility to handle all of your rental and leasing transactions including flight-time based billing.

GFI Faxmaker
This is a fax manager that supports "background" faxing from all Quantum users by using a service based system. This is a third party MAPI compliant fax manager supporting multiple fax servers and Citrix.

Component Control ~ 619.696.5400 ~ info@componentcontrol.com ~ 1731 Kettner Blvd., San Diego, Ca, 92101

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RECOMMENDATIONS

Regulations require that type-certificated products conform to their type design. Aircraft owners, operators, manufacturers, maintenance organizations, and parts suppliers and distributors should inspect their aircraft, maintenance records, and/or parts inventories for oil coolers approved for return to service by Southwest. If any are found in existing stock, it is recommended that the products or parts be quarantined to prevent installation until a determination can be made regarding each product or part's eligibility for installation.

FURTHER INFORMATION

Further information concerning this investigation and guidance regarding the above-referenced products and parts can be obtained from the FAA Flight Standards District Offices (FSDO) given below. The FAA would appreciate any information concerning the discovery of the above-referenced parts from any source, the means used to identify the source, and the actions taken to remove the products and parts from aircraft and/or stock.

This notice originated from the FAA Dallas FSDO, 3300 Love Field Drive, Dallas, TX 75235, telephone (214) 902-1800, fax (214) 902-1862; and was published through the FAA Suspected Unapproved Parts Program Office, AVS-20, telephone (703) 668-3720, fax (703) 481-3002.

UNAPPROVED PARTS NOTIFICATION

U.S. Department
of Transportation
Federal Aviation
Administration

SUSPECTED UNAPPROVED PARTS PROGRAM OFFICE, AVS-20
13873 PARK CENTER ROAD, SUITE 165
HERNDON, VA 20171

UPNs are posted on the Internet at http://www.faa.gov/avr/sups/upn.cfm

No. 2006-00051
April 27, 2006

http://www.faa.gov/aircraft/safety/programs/sups/upn/
Mailed by: FAA, AIR-140, P.O. Box 26460, Oklahoma City, OK 73125

AFFECTED PARTS

Scintilla (Bendix) magnetos.

PURPOSE

The purpose of this notification is to advise all aircraft owners, operators, manufacturers, maintenance organizations, and parts suppliers and distributors regarding improper maintenance performed on Scintilla (Bendix) magnetos, model D9LN-2.

BACKGROUND

Information received during a Federal Aviation Administration (FAA) suspected unapproved parts investigation revealed that C.P. Aero Accessory (C.P. Aero), located at 1452 Gracephil Lane, Paradise, CA 95969, improperly maintained and returned to service Scintilla (Bendix) magnetos.

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C.P. Aero previously held Air Agency Certificate No. OJ3R738L with Accessory Class 1 and 2 ratings.

Evidence indicated that C.P. Aero approved for return to service magnetos that were not overhauled in accordance with the current manufacturer's maintenance manuals. Specifically, C.P. Aero failed to replace bearings, seals, oil slingers, and carbon brushes with new parts during overhaul. Additionally, replacement parts that were installed during overhaul lacked traceability. The affected magnetos were either sold as spare parts or installed on engines.

The table below presents a partial list of magnetos that C.P. Aero approved for return to service.

Work Order Number	Return-to-Service Approval Date	Accessory Name	Manufacturer	Assembly Model Number	Assembly Serial Number
2568	3/17/2004	Magneto	Scintilla (Bendix)	D9LN-2	6969
197	9/27/2005	Magneto	Scintilla (Bendix)	D9LN-2	6969
0004	10/13/2004	Magneto	Scintilla (Bendix)	D9LN-2	02356

RECOMMENDATIONS

Regulations require that type-certificated products conform to their type design. Aircraft owners, operators, manufacturers, maintenance organizations, and parts suppliers and distributors should inspect their aircraft, aircraft records, and/or parts inventories for any magnetos approved for return to service by C.P. Aero. If any referenced magnetos have been installed on aircraft, appropriate action should be taken. If any are found in existing aircraft stock, it is recommended that the magnetos be quarantined to prevent installation until a determination can be made regarding their eligibility for installation.

The FAA has been unable to determine the various types of accessories improperly maintained by C.P. Aero, and therefore recommends inspecting any magneto, starter, generator, tachometer generator, alternator, propeller governor, fuel pump, voltage regulator, reverse-current relay, hydraulic pump, actuator, vacuum pump, relay, or valve that C.P. Aero maintained between 2004 and 2006.

FURTHER INFORMATION

Further information concerning this investigation and guidance regarding the above-referenced parts can be obtained from the FAA Flight Standards District Office (FSDO) shown below. In addition to the above recommendations, the FAA would appreciate any information concerning the discovery of the above-referenced parts, the means used to identify the source, and the action taken to remove the parts from aircraft and/or stock.

This notice originated from the FAA Sacramento FSDO, 6650 Belleau Wood Lane, Sacramento, CA 95822, telephone (916) 422-0272, fax (916) 422-0462; and was published through the FAA Suspected Unapproved Parts Program Office, AVS-20, telephone (703) 668-3720, fax (703) 481-3002.

CONTACT US!

ASA Staff is always interested in your feedback. Please contact us with any comments or suggestions.

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2006 CALENDAR OF EVENTS!

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July 12-13 . . . . . .Hazmat Training, Las Vegas, NV
July 20-21 . . . . . .Hazmat Training, Miramar, FL
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