

# The Update Report

## **The Aviation Suppliers Association**

Volume 12, Issue 2-3 Spring 2004

### REGULATORY UPDATE

### **FAA Documentation Initiatives**

Many ASA members are anxiously awaiting the day that the proposed revisions to the manufacturing rules get published. The reasons for this interest are many, but probably the most important issue potentially addressed in these revisions is the issue of manufacturers' traceability documentation.

Under current regulations, there is no standard documentation required to be issued by a manufacturer with a new part. Although some manufacturers offer the 8130-3 tag as a standard new part identifier, others do not offer it. Customer requests for standard traceability documentation can be difficult or sometimes even impossible to meet because of the maddening lack of standardization in the world of parts documentation.

In the works since ARAC took up the task in 1992, the revisions to the Part 21 manufacturing rules were drafted by an advisory committee made up of FAA and industry personnel. One key feature of the proposed rules was the requirement that all manufacturer must provide an airworthiness approval (8130-3 tag) with each new part that they sell. This would create a baseline for documentation, assuring that distributors could get documentation for new parts that they purchase. would provide a foundation for the documentation matrix found in the distributor accreditation AC.

Programs like DER-issuance of domes-

tic approval tags under FAA Order 8130.71 and FAA Order 8130.21C Change 2 are meant to help assure that existing parts inventories are able to be tagged with the 8130-3 tags, so that existing inventories are not devalued by virtue of their failure to have the documentation normally associated with parts transactions under the new paradigm.

The FAA has been holding onto the Part 21 proposal for five years. But they have not been idle during this time

Last fall the FAA performed a major review of the Part 21 proposal. FAA Manager Frank Paskiewicz had his division update the proposal to reflect new and emerging technologies and paradigms, which reflect significant changes to the base document. They are currently in the process of rewriting the descriptions that will be published as the Federal Register preamble.

With the significant revisions performed, and the normal *ex parte* restrictions on discussion of rulemaking activity, the final scope of the rulemaking is now unknown.

FAA plans to have the Administrator sign the proposal by the end of the calendar year, and then it will go to DOT and OMB for review. Assuming it meets no significant objections at this level, the proposed rule could be published for public comment in 2005.

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Congratulations to the following companies:

**AeroVision International, LLC** Muskegon, MI

For their accreditation, and

Flight Logistics Group Davie, FL

**G&H Aerospace, Inc.** Scottsdale, AZ

Intertrade A Rockwell Collins Company Cedar Rapids, IA

**PSG Industries**Grand Prairie, TX



(Continued on page 14)

## A Message from ASA's President

Don't forget to submit your nominations In this month's issue of The Update for the 2004 Edward J. Glueckler Award. Report, we feature a significant piece The Board will select the recipient at the on exports, and the rules that can Spring meeting for presentation at the affect them. This is part two of a two-Annual Conference. And it isn't too early part series on exports, and it tells you to start making plans for the Annual what the rules are, where to go for Conference in June. We already have a more information, and where to go for substantial number of people registered for the U.S. government lists that affect the hotel; and we are including a exports. registration form in this months Update Report.

(Continued from page 13)

Congratulations to the following companies:

**Aero Industrial Sales Company** Rosedale, NY

> Bel-Air Service, Inc. Westlake Village, CA

**Broadwing Aviation, LP** Ft. Worth, TX

General Transworld Corp. Torrance, CA

> Interaero, Inc. Westlake Village, CA

River City Avionics, Inc. Memphis, TN

Unical Aviation, Inc. Baldwin Park, CA

Air Parts International Sales, Inc. Burbank, CA

> Flight Director, Inc. Austin, TX

For their re-accreditation to the ASA-100 standard in accordance with the FAA's AC 00-56A Voluntary Industry Distributor Accreditation Program

In another note, there appears to be a significant impending governmental focus on supplier control (control of suppliers to the manufacturers). We are seeing Inspector General audits and Congressional oversight of this issue, which will likely result in FAA action aimed at 'suppliers.' should concern you if you are supplying components directly to a production approval holder who incorporates those components into the new-manufactured product.

We will keep you informed as these issues develop.

Best Regards

Michele Dickstein

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**Roy Resto** (414) 875-1234

**Tracer Corporation** 

Mitch Weinberg (305) 685-5511 International Aircraft Associates, Inc.

### The Update Report

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

Jason Dickstein Aviation Suppliers Association 734 15th Street, NW, Suite 620 Washington, DC 20005 voice: (202) 347-6899 fax: (202) 347-6894 email: jason@aviationsuppliers.org

### The Update Report

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

### The Undate 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

For information on special package rates for advertising, contact the Association at (202) 347-6899.

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Monday Morning General Session

Keynote Presentation by Greg Hall, United Airlines

**Airline Economic Trends –** Roy Resto, Tracer Corporation, Messier-Bugatti-Tracer

**Lord of the Wings: The Government Towers** – Jason Dickstein, ASA

**Legislative Alert!** – Marshall S. Filler, Obadal, Filler, MacLeod and Klein, P.L.C.

How to Manage your Inventory Rather Than Having Your Inventory Manage You – Jon Schreibfeder, EIM, Inc.

Monday Afternoon Workshops

**Selling Parts and Services to the DoD** – Roy Resto, Tracer Corporation, Messier-Bugatti-Tracer

**Accurate Demand Forcasting** – Jon Schreibfeder, EIM, Inc.

ILSmart.com - Jim Sdoia, ILS

Lord of the Wings: The Return of the Inventory – Jason Dickstein, ASA

Master and Commander: The FAA Side of the World— Al Michaels, FAA & Beverly Sharkey, FAA

Who Should Attend?

Executive, Legal, Purchasing, QA, QC, Receiving & Sales Personnel

from

Air Carriers, Air Operators, Manufacturers, Parts Distributors and Suppliers, Repair Stations and Gov't Agencies Handling Aircraft Material Tuesday Morning Workshops (Select 2)

Lord of the Wings: The Fellowship of the Export/ Import–Jason Dickstein, ASA

Aeroxchange – Al Koszarek, Aeroxchange Ltd.

Aviation Investigations - Frank Davenport, US DOT OIG

The True Meaning of Distributor Accredition – Jason Lewis, ASA

Business Executive Roundtable: Confession of a Small Business Owner – Karen Odegard, Pacific Aero Tech, Inc; Mitchell Weinberg, International Aircraft Associates, Inc.

Tuesday Afternoon General Session

Business Opportunities: Don't Forget About the Regionals – Richard Mills, Empire Airlines

It's The Law - ASA Staff

**MRO Panel** – Richard Levin, A.J. Levin Co.; Joe Marks, Timco Aviation Services; Marc Belliveau, Air Canada; Cecile Boutier, EADS Aeroframe Services

Sunday Golf Tournament!
Sunday & Monday Dinner Functions!
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Certificate Of Completion Provided to Attendees

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Intertrade, A Rockwell Collins Company

Inventory Locator Service;

M&M Aerospace Hardware, Inc., A B/E Aerospace Company Pratt & Whitney

The Boeing Company

Time Aviation Services, a Unit of Ameron Global, Inc.

Tracer Corporation, Messier-Buggatti-Tracer

Unical Aviation, Inc.

Volvo Aero Services, LP

This is a partial agenda.

For the full agenda and registration form,
see ASA's web site or call and ask the
Association to e-mail/fax the full conference agenda.

Aviation Suppliers Association\* 734 15th Street, NW, Suite 620, Washington, DC 20005\* Tel: (202) 347-6899 \* Fax: (202) 347-6894

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Phone:		Fax:			Phone: (202) 347-6899 Fax: (202) 347-6894
E-mail Address:					1 a.k. (202) 047 0004
Will you attend the QA M Meeting on Saturday June	, 26, 2004.			ot Attend the QA	HOTEL INFORMATION Contact the hotel and make your reservations today! Room block under Aviation Suppliers Association.
Saturday, June 26, 2004	8:30 AM – 4:		QA Committ	ee Meeting	The Ritz Carlton
Odturday, June 20, 2004	2:00 PM – 5:		Registration		600 Stockton Street
Sunday, June 27, 2004	6:30 AM – 8:		*Golf, Regis		San Francisco, CA 94108
Monday, June 28, 2004	6:30 AM – 9:	00 PM	Welcome Di Registration	, Breakfast,	Tel: (800) 241-3333 or (415) 296-7465
				nference, AM/PM	Special rate of \$159.00 + tax
			Break, Lunc Workshops.	Reception &	per night!
Tuesday, June 29, 2004	7:00 AM – 3:	00 PM	Banquet Din Member's O Meeting, Exl	ner nly Breakfast hibits, Workshops unch, Exhibits,	<b>ROOM RESERVATION POLICY</b> : In order to retain your room reservation, ASA must receive your conference registration form by June 4, 2004.
(*All events except Golf are	e at The Ritz Ca	rlton)	Ocheral Oce	551011	SPOUSE/COMPANIONS? Guest
WORKSHOP SCHEDULE		,			name:
Monday – June 28, 2004		Tuesday	v – June 29, 200	24	
PM SESSION ONLY (90 n 1:30 PM – 3:00 PM 3:30 PM – 5:00 PM Circle 2 Workshops	ninutes)	AM SES 8:30 AM 10:15 AM	SION ONLY (7 - 9:45 AM M - 11:30 AM e <b>2 Workshop</b> :	5 minutes)	Sunday and Monday evening social events are included in Spouse/Companion registra- tion fee. (A Spouse/ Companion is one who does not work for the company whose representative is attending the ASA
(A) Selling Parts & Service	s to DoD			e Export/Import	conference.)
(B) Accurate Demand Fore		(G) Aero	xchange		Total enclosed:
(C) ILSmart.com			tion Investigation		MC/Visa AMEX
<ul><li>(D) The Return of the Inve</li><li>(E) Master and Commande</li></ul>			rue Meaning of editation	Distributor	IVIC/VISA AIVIEX
The FAA Side of the W			ess Executive	Roundtable	Credit Card #
	ave \$50 if Registe By April 30, 2004 "Early Bird Fee"	red I Ap	ril 30-June 21 Conference Fee	After June 21, 2004	Exp. Date
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Member Add'l Attendee			\$575	\$625	Card Holder Signature
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Non-Member Add'l Attende			\$675	\$725 \$450	<b>CANCELLATION POLICY</b>
Spouse Companion			\$150 \$125	\$150 \$125	All conference cancellations must be
	•	F ·			received in writing. Cancellations before May 28, 2004 will be charged a
*Early bird fee does not apply information must be received registration rate, check or cred 21, 2004. Special Rates avail ASA for details.	at ASA by 4 PM e dit card information	st., April 3 n must be	0, 2004To receive received at ASA	e pre-conference by 4 PM est., June	\$75.00 service fee. There will be no refund for cancellations received on or after May 28, 2004. There will be no refund for golf cancellations by
Interested In exhibiting? L	imited space av	ailable.			registrants. If the golf tournament is

registrants. If the golf tournament is cancelled by the golf course a percentage of the golf fee will be refunded.

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### **Av-Ex New Hire**

## **ASA Members Honored by Boeing**

AV-EX Hires New Sales Exec

AV-EX Aviation Excellence is pleased to announce the staff addition of Isabel Fernandez. Isabel has been named "Airline Sales Executive" and is responsible for sales to the Latin American market.

Isabel has joined AV-EX to continue with her interests in International Business. She is multi-lingual, speaking English and Spanish as her native languages, and Portuguese and French fluently. She has traveled extensively and lived in the US, Mexico, Bolivia, Spain, England, and France. For additional information, contact Brenda Ralston at (214) 267-0800.

On March 31, Boeing honored its top suppliers in eleven different categories by naming them Supplier of the Year. We are proud to announce that the winners in two categories were ASA members: Pacific Aero Tech and Aeroflite Enterprises.

Pacific Aero Tech, of Kent, WA, is the Supplier of the Year in the Aerospace Support category. Pacific Aero Tech (PAT) is an FAA/JAA/CAAC approved repair station with specialization in the areas of avionics, windows, hoist equipment and passenger service units. The company was founded in 1987 and has been a Boeing supplier and licensee since its inception. Services provided to Boeing by PAT in-

clude technical support and repairs for Gables Engineering parts and a comprehensive window maintenance program.

Boeing lauded PAT for its perfect quality and delivery records. PAT provides post-warranty repairs and overhauls of windows and windshield assemblies for all Boeing commercial airplane models, stripping, re-anodizing and curing frames, installing new windows, and curing window sealants. Boeing cited a number of the PAT features that lead to this award:

• high level of responsiveness in providing price quotes,

(Continued on page 26)

### EXPORT TESTIMONY

## **More Tips For Exporters**

The aerospace industry is global in scope, and U.S. aircraft and components are used all over the world. As a consequence, aircraft parts distributors in the United States have many sales opportunities abroad. Export transactions, however, are subject to a wide range of laws and regulations, both U.S. and foreign, that do not apply to domestic transactions in the United States. ASA frequently gets questions from its members concerning the rules governing export transactions.

In part one of this series, published in the last issue of <u>The Update Report</u>, we addressed some of the resources available to help Americans ensure that their exports continue to meet the legal standards imposed by a wide variety of United States laws – particularly lists of parties with whom American companies may NOT do business. This article represents part two of this two part series, and it provides further details about export licensing, forbidden

trading partners, general export tips and sources for further assistance.

How to Determine If You Need a BIS Export License

In last month's article, we explained that only a relatively small percentage of total U.S. exports and re-exports require a license from BIS. License requirements are dependent upon an item's technical characteristics, the destination, the end-user, and the end-use. Exporters must determine whether their export requires a license. When making that determination, the exporter must consider:

- What is being exported?
- Where is it being exported?
- Who will receive the item?
- What will the item be used for?

What Is Being Exported?

The key in determining whether an export license is needed from the Department of Commerce is knowing

whether the item intended for export has a specific Export Control Classification Number (ECCN). The ECCN is an alpha-numeric code, *e.g.*, 3A001, that describes a particular item or type of item, and shows the controls placed on that item. ECCNs are listed in the Commerce Control List (CCL) (Supplement No. 1 to Part 774 of the EAR) which is available through the BIS web site. The CCL is divided into ten broad categories, and each category is further subdivided into five product groups.

Identifying an ECCN

The proper classification of the item to be exported is essential to determining any licensing requirements under the EAR. Exporters may classify the item on their own, check with the manufacturer, or submit a classification request to the BIS asking the agency to determine the ECCN.

(Continued on page 22)



# ENERGIZING the market

This year's event will showcase three conference programs: MRO, MRO Latin America and the new MRO Military conference. Now, aviation maintenance managers from every sector can get the information they need to succeed in one place at one time.

### **REASONS TO ATTEND**

- Objain budger and market forecasts for commercial, military and Latin American sectors
- Learn strategies to meet supply chain demands during war and peacetimes
- Discover training methods for developing maintenance talent
- Get cutting-edge solutions to improve operations
- Hear stories from the trenches to avoid costly mistakes

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#### **KEYNOTE ADDRESSES:**

- Alberto Fajerman, Executive Vice President & COO, YARIG
- Gen. John Jumper, Chief of Staff, U.S. Air Force
- Lou Mancini, Senior Vice President, Commercial Aviation Services, Boein
- W. Douglas Parker, Chairman, President & CEO, America West Airlines

### **SPEAKERS INCLUDE:**

- Tom Anderson, Vice President, Technical Operations & Aircraft Programs, jetBlue Airways
- Joaquin (Archie) Archilla, Director, FAA/Latin America and Caribbean Office
- Judson Brandt, Director, Process & Technology Engineering, Delta Air Lines
- Vicki Bretthauer, Aviation Consultant, ASTAR Air Cargo
- Allyson Freyre, Director, Quality Assurance, Alaska Airlines
- Harry Gregory, Senior Vice President & General Manager, Collins Aviation Services, Rockwell Collins
- Sharon Grey, Director, Quality Assurance, America West Airlines
- Jeff Jones, Staff Vice President, M&E Technical Support, Alaska Airlines
- Bruce Ketola, Director, Engine Contracts & Materials and Warranty, Northwest Airlines
- Michael Kordys, Manager, Quality Assurance, JetBlue Airways
- Pierre Lanthier, Director, Information Technology, Technical Services, Air Canada
- VADM Keith Lippert, Director, Defense Logistics Agency
- Dr. Chris Markou, Project Manager-Business Development, Delta Air Lines
- Wayne Maxey, Director, Regulatory Affairs, Boeing
- Mark Moran, Senior Vice President, Technical Operations & Purchasing, Continental Airlines
- David Nakamura, YP-Productivity and Development, Delta/Aeromexico Sky Team
- Rick Oehme, Vice President, Engineering & Quality, America West Airlines
- Udo Rieder, Vice President, Engineering & Planning, Delta Air Lines
- John Stelly, Managing Director, Technology, Continental Airlines
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### **FAA Issues Guidance JAA To EASA Transition**

As the new European Aviation Safety Agency (EASA) continues to take shape and assume its responsibilities, the FAA has published guidance for its Aviation Safety Inspectors (ASIs) informing them about new documentation and transition procedures. Few major changes are expected in the near future. Although some Joint Aviation Authorities (JAA) forms, to include the JAA Form 1, will be superceded by EASA forms in the coming months, there will be few, if any, substantive changes to the forms themselves. ASIs are instructed to continue using existing guidance applicable to dealings with the JAA until new EASA guidance is published.

EASA was formally established in September 2003 and is responsible for regulating aircraft certification and maintenance throughout the European Union. The agency is gradually taking over the maintenance-related functions currently performed by the JAA, among them the acceptance and oversight of repair stations. EASA regulations are published by the European Commission in order to make them legally binding. In most cases, EASA is basing its regulations on the existing Joint Aviation Requirements (JARs) with very few changes. In this manner, European authorities are attempting to preserve much of the detailed harmonization work that has gone on between the JAA, the FAA, and Transport Canada over the past decade.

The European Commission published its Regulation for Continuing Airworthiness on November 28, 2003. It includes four annexes, which are informally referred to by the number of the JAR on which they were based: Annex 1 ("Part M"); Annex 2 ("Part 145"); Annex 3 ("Part 66"); and Annex 4 ("Part 147"). EASA "Part 145" and its associated guidance material are similar to JAR 145 and its associated Guid-

ance Material (GM), Temporary Guidance Leaflets (TGLs) and Acceptable Means of Compliance (AMCs).

The United States ultimately plans to conclude a Bilateral Aviation Safety Agreement (BASA) with the European Community as a whole that will replace the BASAs it currently has with individual European Union countries. Existing BASAs will remain in effect until then. Similarly, the Maintenance Implementation Procedures (MIP) in force between the United States and France, Germany, and Ireland will remain in effect until the EC BASA is concluded. The MIPs allow the FAA to rely on findings made by French, German, and Irish aviation authorities during surveillance and during inspections for the purpose of providing the FAA with a recommendation for certification of part 145 foreign repair stations in their respective countries. At the same time, the MIPs allow all 37 JAA members to rely on FAA certification and surveillance of JAAaccepted repair stations in the United States.

### The Future Of The JAA

The fate of the JAA has been a major question ever since EASA was proposed. The situation is complicated by the fact that the JAA includes member authorities from countries that are not EU Member States or EU candidate members. Non-EU JAA members are not required to adopt EASA rules, guidance materials, certification specifications, or to rely on the findings of EASA to issue their own certifications. However, because key JAA members are now required to follow EASA rules on aircraft certification and maintenance, the JAA's role in these areas will diminish. Initially, the JAA will continue to carry out many of these functions under contract to EASA, such as Maintenance Aviation Standardization Team (MAST), and Maintenance International Standardization Team (MIST) visits. EASA will gradually assume leadership in these areas. In addition, EASA itself has joined the JAA, allowing EASA to participate in the JAA for the benefit of non-EU members. In the areas of aircraft certification and maintenance, the JAA will likely be reduced to a small governing body to make EASA decisions applicable to other JAA members. The latest information regarding the transition and EASA development is on the JAA Web page at http://www.jaa.nl or http://www.easa.eu.int.

### Transition Procedures

In the coming months, several JAA forms will be converted into EASA forms and begin to make their appearance:

- JAA Form 1, Authorized Release Certificate, will become EASA Form 1
- JAA Form 9, FAA Status Report on a FAR Part 145 Repair Station JAA Accepted or Applicant for JAA Acceptance, will become EASA Form 9, Recommendations for Renewal and Surveillance
- JAA Form 16, USA Repair Station Application for Initial/Renewal/Amendment of JAA Acceptance in Accordance With JAR-145, will become EASA Form 16, Application for EASA Approval of U.S. Domestic Repair Stations

During the transition from JAA to EASA, the FAA is instructing its ASIs to give the same validity to EASA forms as they currently give JAA forms. The FAA notes, however, that some JAA forms such as JAA Form 1 may continue to be used by non-EU member countries. The FAA pledges

(Continued on page 27)

## **Edward J. Glueckler Award Nominations Sought**

Nominations are now being accepted for the Association's Edward J. Glueckler Award! Nominations are due not later than April 23, 2004.

Past award recipients have included

- Time Aviation's John Butler (2003)
- Boeing's Peter Gallimore (2002)
- Northwest Airlines' William Tipton (2002)
- FAA SUPs Manager Ken Reilly (2001)
- International Airline Support Group's Jay Rosenberg (2000)
- FAA National Resource Specialist Al Michaels (1999)
- ASA's Founder Edward Glueckler (1998)

History

Edward J. Glueckler was the founder and first President of the Aviation

Suppliers Association. He started the Association out of his own home and watched it grow to 180 members. He left the Association in August 1997.

During his tenure, he served as the Chairman of the Industry Suspected Unapproved Parts Steering Committee, a group that develops and implements strategies for preventing unsafe parts from being installed on aircraft. This group works closely with the FAA to promote aviation safety.

He was also instrumental in the development of the FAA's Voluntary Industry Distributor Accreditation Program. The Program permits aircraft parts distributors to seek third-party accreditation to a standard that the FAA has found acceptable. It allows distributors with robust quality systems to receive FAA acknowledgement of their efforts to promote safe aircraft parts.

In special recognition of Mr. Glueck-ler's efforts, the Association named its annual award after him. The Edward J. Glueckler Award is presented annually in recognition of outstanding commitment, dedication and contribution to the Aviation Suppliers Association and to the aviation industry.

The Nominating Process

Any ASA member company may nominate a person to receive the Edward J. Glueckler Award. This privilege is reserved solely to members, and ASA will not accept nominations submitted by non-members. The submitter must be a member on the day that the nomination is received and processed by ASA or the nomination will be rejected. Because ASA must be able to confirm that the nominating party is an ASA member, anonymous nominations will not be accepted.

(Continued on page 21)

June 26-29, 2004

### The Ritz Carlton-San Francisco, CA

www.ritzcarlton.com



## ASA 2004 Annual Conference

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See adgenda and registration details on pages 15 & 16 in this issue. Complete conference program available on our website at:

www.aviationsuppliers.org

### Glueckler Award Nomination Details

(Continued from page 20)

Each ASA member company may nominate as many persons for this honor as that company deems appropriate, with no limit.

The nomination should include the nominees full name, and a brief biographical statement describing the nominees qualifications that make him or her worthy of the Edward J. Glueckler Award. The brief biographical statement shall not exceed 300 words in length. The nominating member's complete corporate name, address, telephone number, and ASA contact person should be listed on the nomination form. Contact information for the nominee is appreciated.

ASA reserves the right to reject nominations that are incomplete.

**Eligibility** 

Anyone whose efforts have contributed to the Aviation Suppliers Association and to the aviation industry is eligible to be nominated. The individual does not have to be an ASA member, nor an employee of an ASA member, to be nominated. For example, a retired person who used to work for an ASA member might be nominated in recognition of his or her lifetime of contribution to the industry.

Selection Criteria

The Edward J. Glueckler Award will be presented annually in recognition of outstanding commitment, dedication and contribution to the Aviation Suppliers Association and to the aviation industry. Nominees should be persons who have made significant contributions to the Association and its members. Examples may include persons who have devoted significant time as volunteers on Association committees, or persons who have made considerable efforts to increase or enrich the membership of the Association.

The ASA Board of Directors will select the Edward J. Glueckler Award recipient at their May 2004 meeting.

Collection of Nominations

Nominations will be accepted until close of business at the ASA office on April 23, 2004. They may be faxed, mailed, or emailed but the nominating party is responsible for ensuring their timely arrival.

Presentation

The Edward J. Glueckler Award shall be awarded to the recipient at the ASA Annual Conference. In the event the recipient is unable to accept his or her award in person, ASA will announce the winner at the conference, and will send the award to the recipient in a manner calculated to reach the recipient, such as by giving it to a person designated by the recipient.



## Four Questions to Ask About Your Exports

(Continued from page 17)

When reviewing the CCL to determine if an item is specified by an ECCN, an exporter must first determine in which of the ten broad categories of the Commerce Control List their item is included and then consider the applicable product group. Some of the categories that may be relevant for distributors include:

- Category 1 = Materials, Chemicals, Microorganisms and Toxins (includes certain fluids and lubricating materials and certain explosive materials, even when contained in commercial devices)
- Category 2 = Materials Processing (includes certain bearings)
- Category 3 = Electronics
- Category 4 = Computers
- Category 6 = Sensors and Lasers (includes some radar devices)
- Category 7 = Navigation and Avionics
- Category 9 = Propulsion Systems, Space Vehicles, and Related Equipment (includes certain aircraft engines and related components)

Once the proper category has been selected, the exporter would check the Commerce Control List found in Supplement 1 to Part 774 of the Export Administration Regulations to identify the appropriate ECCN.

There are short cuts to this process. Often, an exporter can identify an ECCN by contacting the manufacturer. In addition, BIS's Office of Exporter Services in Washington D.C. [at (202) 482-4811] or in Newport Beach, CA [(949) 660-0144] can help guide you in attempting to determine your ECCN using the Commerce Control List. Although BIS does not provide official classification determinations by phone because they do not have access to all

of the necessary technical information about the product, they can help guide an exporter through the classification determination process.

Where there is no prior determination upon which to rely, BIS can also provide an official determination. The exporter should submit a classification request on Multipurpose Application Form BXA-748P, or on-line through the Simplified Network Application Process (SNAP):

http://www.bxa.doc.gov/SNAP/default.htm

If an item falls under U.S. Department of Commerce jurisdiction and is not listed on the CCL, it is designated as "EAR99." EAR99 items generally consist of low-technology consumer goods and do not require a license in many situations. However, if the proposed export of an EAR99 item is to an embargoed country, to an end-user of concern or in support of a prohibited end-use, the exporter may be required to obtain a license.

Where Is It Being Exported?

Restrictions vary from country to country. The most restricted destinations are the "embargoed" countries and those countries designated as supporting terrorist activities including Cuba, Iran, Iraq, Libya, North Korea, Sudan, Syria. Nevertheless, specific restrictions apply for particular items going to a wide range of other countries as well (for example, law enforcement-related items going to countries with poor human rights records). If the item to be exported is on the Commerce Control List, the next step is to determine whether you need an export license based on the "reasons for control" of the item and the country of ultimate destination.

Each ECCN entry in the Commerce

Control List lists specific "Reasons for Control" for the item in question (e.g., NS for National Security, AT for Anti-Terrorism, CC for Crime Control, etc.). Exporters must cross-reference this reason code or codes with the Commerce Country Chart (Supplement No. 1 to EAR Part 738), which lists which reason codes apply to specific countries. If there is an "X" in the box based on the reason(s) for control of your item and the country of destination, a license is required, unless a License Exception is available. Part 742 of the EAR sets forth the license requirements and licensing policy for most reasons for control. If there is no "X" in the control code column(s) specified under the applicable ECCN and country of destination, no export license is required unless you are exporting to an end-user or end-use of concern.

Although a relatively small percentage of all U.S. exports and re-exports require a BIS license, virtually all exports and many re-exports to "embargoed" destinations and countries designated as supporting terrorist activities require a license. These countries are Burma (Myanmar), Cuba, Iran, Iraq, Libya, North Korea, Serbia & Montenegro, Sudan, Syria, and Zimbabwe. Part 746 of the EAR describes embargoed destinations and refers to certain additional controls imposed by the Office of Foreign Assets Control (OFAC) of the Treasury Department. The countries currently subject to restrictions can be found on the OFAC web site at

http://www.treas.gov/offices/eotffc/ofac/sanctions/index.html

Note that this list changes with the geopolitical winds, as do the restrictions specific to each country, so it is important to check back frequently.

(Continued on page 23)

## **Be Sure to Check the BIS Lists for Export Compliance**

(Continued from page 22)

Who Will Receive The Item?

Certain individuals and organizations are prohibited from receiving U.S. exports and others may only receive goods if they have been licensed, even items that do not normally require a license based on the ECCN and Commerce Country Chart or based on an EAR99 designation. Exporters must be aware of the following lists, all of which can be accessed through the BIS web site at

http://www.bxa.doc.gov/Compliance AndEnforcement/index.htm#LTC

- Entity List EAR Part 744, Supplement 4 A list of organizations identified by BIS as engaging in activities related to the proliferation of weapons of mass destruction. Depending on the item to be exported, exporters may be required to obtain a license to export to an organization on the Entity List even if one is not otherwise required.
- Specially Designated Nationals And Blocked Persons List EAR Part 764, Supplement 3 A list maintained by OFAC comprising individuals and organizations deemed to represent restricted countries or known to be involved in terrorism and narcotics trafficking. The list includes not only obvious and infamous figures such as Osama Bin Laden, Slobodan Milosevic, and Saddam Hussein, but also numerous "drug kingpins" and lesser figures whose names are not necessarily household words.
- The *Unverified List* is composed of firms for which BIS was unable to complete an end-use check. Firms on the unverified list present a "red flag" that exporters have a duty to inquire about before mak-

ing an export to them.

• Denied Persons list - Exporters may not participate in an export or re-export transaction subject to the EAR with a person whose export privileges have been denied by the BIS. A list of those firms and individuals whose export privileges have been denied is available on the BIS web site. Note that some denied persons are located within the United States. If you believe a person whose export privileges have been denied wants to buy your product in order to export it, you must not make the sale and should report the situation to BIS's Office of Export Enforcement. If you have questions about Denied Persons, vou may contact BIS's Office of Enforcement Analysis at (202) 482-4255.

What Will The Item Be Used For?

Some end-uses are prohibited while others may require a license. For example, exporters may not export to certain entities involved in the proliferation of weapons of mass destruction (*e.g.*, nuclear, biological, chemical) and the missiles to deliver them, without specific authorization, no matter what the item is. For more information on prohibited end- uses, please refer to Part 744 of the EAR.

Know Your Customer!

Exporters are expected to exercise due diligence in ensuring that their customer is not subject to export controls. This entails being prepared to ask questions concerning the customer's identity and intended use for the item. One of the tools available to help exporters weed out potentially suspect transactions is the list of "red flags" published by the BIS. "Red flags" are warning signs that indicate exported goods might be intended for inappropriate

end-use, end-user, or destination. The BIS lists a number of red flags on its web site at

http://www.bxa.doc.gov/ Enforcement/redflags.htm

Examples include where the customer's name or address is similar to that of an entity on the BIS's List of Denied Persons; where the customer or purchasing agent is reluctant to offer information about end-use; or where the customer is willing to pay cash for an expensive product when terms of sale usually involve financing.

If even *one* of these indications of trouble is present, the exporter is required to investigate the matter and to ensure that the transaction is legal.

This can be a delicate business at times – few people like to antagonize a would-be customer by pressing for information that he or she doesn't seem to want to share.

Still, if a red flag is present, an exporter must either dig a little deeper or walk away from the deal – the government looks for signs of "willful blindness" when investigating possible illegal transactions, and punishes violators harshly.

But Be Wary About Complying With Other Countries' Laws

Just as the U.S. government requires exporters to comply with its own boycotts, it *forbids* exporters to take part in boycotts organized by other countries that it disapproves of.

Probably the most prominent example is the boycott of Israel maintained by several Arab countries. Under U.S. law, exporters are not permitted to let officials or customers in these other countries impose conditions or limits

(Continued on page 25)

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# INTRODUCING

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## **Summary of Export Steps for Legal Compliance**

(Continued from page 23)

on their transactions because they deal with Israel or have Israeli nationals on their payroll.

The office responsible for enforcing this requirement is the BIS's Office of Antiboycott Compliance. More information is available on their web site at

http://www.bxa.doc.gov/antiboycottcompliance/default.htm

### Where To Get Assistance

A good starting point for information on export licensing requirements and the regulations is the BIS web site, which contains links to the various agencies, regulations, and lists described here. Exporters in the market for more interactive training may wish to attend one of the BIS's export control seminars. A list of upcoming seminars is posted on the BIS web site at http://www.bxa.doc.gov/seminarsandtr aining/elsem.htm. For counseling assistance, you may call a BIS export counselor at (202) 482-4811 (Washington, DC) or (949) 660-0144 (California)

Summary Of Steps To Take To Process Your Export

- Ensure that your export is under U.S. Department of Commerce jurisdiction.
- Classify your item by reviewing the Commerce Control List.
- If your item is classified by an Export Control Classification Number (ECCN), identify the Reasons for Control on the Commerce Control List.
- Cross-reference the ECCN Controls against the Commerce Country Chart to see if a license is required. If yes, determine if a License Exception is available

before applying for a license.

- Ensure that no proscribed endusers or end-uses are involved with your export transaction. If proscribed end-users or end-uses are involved, determine if you can proceed with the transaction or must apply for a license.
- Export your item using the correct ECCN and the appropriate symbol (e.g., NLR, license exception, or license number and expiration date) on your export documentation (e.g., Shipper's Export

Declaration).

Exports are undeniably more complicated than domestic transactions, but they represent a potentially lucrative source of business for companies willing to do their homework and brave the thicket of rules and regulations. The information provided above should help would-be exporters start moving in the right direction.

## **HAZMAT TRAINING?**

The Federal Regulations state that anyone who ever ships hazardous materials is a hazmat employer. The FAA has stated that companies who receive aircraft parts, like repair stations are presumed to be hazmat employers because of the significant number of hazmats used in our industry. Hazmat employers are required by law to train any employee who affects the safe transportation of hazmat.

If you ship used engine components, batteries (including apparatus with primary or back-up battery power), chemical oxygen generators, certain control surface counter-weights (which may have a low-level of radioactivity), paint, or anything with fuel residue remaining in it, then you may be shipping hazmat!!

ASA provides the training that the law says you MUST have. ASA has already held its first 2004 recurrent hazmat training class in Florida, and is continuing to develop its fall training schedule RIGHT NOW.

If you need recurrent or initial hazmat training, call ASA at (202) 347-6898 and ask for Jeanne Meade.

## Pacific Aero Tech and AeroFlite Enterprises Honored by Boeing



(Continued from page 17)

- product support among the best in their industry
- customer service among the best in their industry
- turnaround time less than half of the industry average
- extremely competitive AOG turnaround time.
- The best pricing to Boeing customers, based upon a total value analysis.

Aeroflite Enterprises, Inc., of Brea, CA, is the Supplier of the Year in the Woman-Owned Small Business category. AeroFlite is an exclusive authorized distributor and value-added assembly facility for electrical components for Boeing Commercial Airplanes and

Integrated De-Systems. fense Boeing lauds their commitment to quality as outstanding. From January through September 2003, delivered thev more than 60,000 parts to Boeing with zero rejections, maintaining a nearly perfect delivery rating of

99.7 percent. They maintain ISO 9002, and AS 9000 certifications. AeroFlite's pricing has not changed since 1999, and, in current statement-ofwork negotiations, they are 56.6 percent below the previous AeroFlite buv. has demonstrated

their partnering style by supporting new FAA-mandated requirements for advanced fabrication and inventory buildup at no additional cost to Boeing. This year, they are moving to a new facility that will provide for additional support to Boeing. In business since 1977, the company has 46 employees. AeroFlite President, Chief Executive Officer and Owner Lesley Hall has also been honored with the "Woman Business Owner of the Year" award from the National Association of Woman Business Owners.

"It takes great partners to help our team achieve new heights, and these suppliers are at the top of their class," said Jim Morris, Vice President of Supplier Management for Boeing Commercial



Airplanes and chair of the Boeing Supplier Management Process Council. "They embody the best of industry and the ideals we value in all of our supplier partners. Their innovation, integrity, agility and willingness to go above and beyond for our customers fuel the success of our entire Boeing team in today's highly competitive global market."

"The 2003 Boeing Suppliers of the Year are a diverse and amazing group," Morris said. "Each has a unique story to tell about how they tackle their business challenges. Yet, a common thread unites them, and that is the passion they share for excellence. We are honored to call them teammates."



Boeing instituted the Supplier of the Year award in 2001 to reward suppliers and service providers for exceptional performance. This year's winners were selected from a field of 10,600 companies in 66 countries. There were a total of 13 winners, in eleven categories, from 3 countries. The winning suppliers in each category were chosen on statistical measurements of quality, ontime delivery, post-delivery support and cost during the 12-month period preceding September 2003. They also were evaluated on their ability to anticipate and respond to changing customer requirements.

## **Boeing Announces Engines for 7E7**

Boeing has selected two engine types, the General Electric GENX and Rolls-Royce Trent 1000, for its all-new Boeing 7E7 Dreamliner, an airplane that is expected to provide the world's airlines with exceptional efficiency and environmental performance.

Boeing's decision follows months of collaboration with the leading manufacturers of large commercial airplane engines.

"The General Electric and Rolls-Royce engines will enable the 7E7 to fly higher, faster, farther, cleaner, quieter and more efficiently than comparable airplanes," said 7E7 Senior Vice President Mike Bair. "Having an engine choice is a key consideration for our customers. We're now offering two excellent options for the 7E7."

Both engine types will be capable of providing between 55,000 and 70,000 lbs. of thrust, which will allow the three planned 7E7 models to use the same basic engines.

For the first time in commercial jet history, both engine types will use the same standard interface with the airplane, allowing any 7E7 twinjet to be fitted with either engine at any point in time. Engine interchangeability makes the 7E7 a flexible asset that can easily be moved among carriers, an attractive feature for financiers, leasing companies and airlines. Other 7E7 innovations include the elimination of traditional bleed air systems in favor of an efficient, more-electric architecture.

General Electric's new engine, called the GENX (GE Next Generation), is derived from the ultra-high-thrust GE90 engine, which has a proven track record on twin-engine aircraft. The GENX technologies include composite fan blades, the highest pressure-ratio compressor in aviation, and a unique single-annular combustor (where compressed air and fuel are mixed) to achieve dramatically lower emissions. The GENX will have its first fullengine test in 2006. The engine is being designed and tested at GE Transportation's world headquarters in Evendale, Ohio. Final assembly will occur in Durham, N.C.

"Our engine for the 7E7 represents the culmination of new technologies for which GE has made considerable investments over many years," said David Calhoun, president and CEO of GE Transportation. "Needless to say, this is one of the biggest days in the history of our jet engine business."

Rolls-Royce will produce a new variant of its successful, high-thrust Trent engine series to power the 7E7, the Trent 1000. Designed to deliver optimum performance with minimum development risk, it will be the fifth member of the Trent family to enter service, once again featuring the three-shaft design layout unique to Rolls-Royce. The engine will be the most efficient and environmentally advanced Trent ever built.

Mike Terrett, president of Civil Aerospace for Rolls-Royce, said, "This is a special day in the long and rewarding relationship between our companies. Now, once again, our focus is on bringing a new generation of Trent successfully to market."

Boeing has announced that it is continuing to receive strong customer support for the 7E7 and has submitted a number of firm contract proposals to airlines. The company expects to launch the new airplane this year.

### **EASA**

(Continued from page 19)

to inform ASIs of any new developments that may impact maintenance documentation requirements.

The FAA is instructing ASIs with JAA repair station acceptance located in the United States to continue following the procedures described in FAA Order 8300.10, Airworthiness Inspector's Handbook, volume 2, chapters 167, 168, and 169 for processing JAA initial, renewal, and JAA MIST team procedures until further notice. The industry should to continue to follow Advisory Circular (AC) 145-8, Acceptance of Repair Stations by the JAA and JAA-Member NAAs Under the Maintenance Implementation Procedures of a Bilateral Aviation Safety Agreement, as amended, and JAA TGL No. 22.

In addition, FAA Order 8100.14, Interim Procedures for Working with the European Community on Airworthiness Certification and Continued Airworthiness, provides detailed information on the import and export changes that may affect current and future products. The order may be accessed at <a href="http://www1.faa.gov/certification/aircraft/">http://www1.faa.gov/certification/aircraft/</a> via the "Regulations, Policy, and Guidance" publications tab at left.

Look Closely

Although FAA and EASA officials stress that they are endeavoring to make the JAA-EASA transition as smooth as possible, repair stations should carefully review new EASA regulations and guidance as they appear to ensure that there have not been significant substantive changes. Sometimes even relatively minor changes in wording can have a large effect, whether or not that effect was intended. ASA members who discover or encounter problems that could affect their business are encouraged to bring them to the association's attention.

## The Economy and Aircraft Parts Sales

In order to predict future growth in our industry, it is important to understand how we came to where we are today.

Most laymen point to the terrorist attacks of September 11, 2001 as the source of economic troubles for both the country in general and the aviation industry in particular. Most knowledgeable persons will also look at the SARs epidemic as either an exacerbating factor or a separate source of depression in the international air travel market.

In fact, both of these "sources" are more accurately thought of as exacerbating factors, rather than sources of our industry's economic troubles. Our problems began at least a year before September 11, 2001.

After the dot-com bust, industrial production plummeted beginning in September 2000, and by March of 2001 employment figures had began to slide. This set the stage for a reduction in travel. The reduction in travel hit the air carriers in the pocketbooks, and required them to cut costs - not all of them were able to economize in order to remain solvent. Once one air carrier sought the protection of the bankruptcy courts, this had an adverse affect on the remainder, because it decreased financial confidence in the air carriers as a whole (making credit more difficult to obtain) and it adversely affected debts owed among the air carriers.

What effect did the exacerbating effects of 9/11 and SARs have on an already soft aviation economy? They multiplied the normal effects of recession beyond the industry's absorption capability.

History tells us that normal recessions involve small drops in revenue passenger miles, followed by elastic return to within one or two percent below the original revenue passenger miles. Subsequent growth reflects a 'full recovery' scenario. Commercial passenger aviation is an industry that lives in the margin and whose fortunes can be effected by a very small percentage change in revenue passenger miles. Immediately after September 11, 2001, though, the industry experienced a 33% drop in revenue passenger miles. This has lead to an unprecedented depth of recession in our industry.

Half of the total job loss after September 11 was in aviation and travel industries. American job figures have not fully recovered in part because the aviation industry's job figures have not fully recovered. Because of the efficiencies forced on the industry after

The down side to a leaner, more efficient aviation industry is that there are fewer opportunities for distributors to profit through the recognition and correction of inefficiencies.

9/11, it is possible that aviation industry job figures may never fully recover. This does not mean that the aviation industry won't recover though – in fact we are likely to recover as a leaner, more efficient industry.

Of course, the down side to a leaner, more efficient aviation industry is that there are fewer opportunities for people to profit through the recognition and correction of inefficiencies.

America has taken a number of steps to correct the economy. Some of these,

like individual tax cuts and homeland security, are more symbolic than anything else, but even symbolism is important to an industry that thrives on passengers who feel that travel is a privilege to be enjoyed in good times, but one that can be relinquished in bad times due to technological advances in teleconferencing, video conferencing, and instant written communication through email and electronic collaboration systems. A more liberal monetary policy has helped to make sure that there is plenty of cash infusing the economy and the resulting confidence levels are important to the promotion of business and personal travel.

The economy is a buoyant thing. Industrial production today is up sharply – whether that can be attributed to tax cuts, liberal money policies, or simply the normal ebb-and-flow of the economy is matter to be debated by economists. What is clear, though, is that domestic employment, which generally lags several quarters behind industrial production, is also beginning to rise.

There are still many hurdles to overcome before the commercial aviation industry is once again on comfortable footing. Fuel and energy process could reflect future growth impediments for air carriers. One more disaster that affect global aviation like 9/11 and SARs did, could plunge us right back into the harsh economic times that we are trying to put behind us. Nonetheless, some economists are predicting that the next eight years will represent growth for the world economy, and the increase in travel that would bring bodes well for the growth of the aviation industry. The regrowth of the economy, and the commercial aviation industry, is essential to the continued growth of ASA's member companies.

## Former ASA Conference Speaker Authors Aviation Book

Many of you may remember Kaye Shackford, who presented a workshop on "Interest-Based Negotiation" at the ASA 2000 Annual Conference in Las Vegas. She has published a new book on the aviation industry, entitled "Charting A Wiser Course: How Aviation Can Address the Human Side of Change."

Shackford wrote her book based on feedback from her Negotiating Solutions workshop. Her goal was to provide a forum to encourage discussions within the aviation industry. It's meant to be shared as a way to address the human side of transformational change efforts such as lean, integrated supply chain management, customer-centered selling, etc. Shackford explains, "If people read it and tell others about it, we can spread a conversation that can help change our industry."

The book is only available through two web sites. To read an excerpt from or to buy "Charting A Wiser Course: How Aviation Can Address the Human Side of Change," visit the websites at:

http://www.chartingawisercourse.com http://www.negotiatingsolutions.com

Kaye Shackford established the Mattford Group in 1998 which is a consulting company specializing in marketplace strategy and skills training and consulting.

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## UNAPPROVED PARTS NOTIFICATION

SUSPECTED UNAPPROVED PARTS PROGRAM OFFICE, AVR-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



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

No. 2004-00055 April 5, 2004

Published by: FAA, AIR-140, P.O. Box 26460, Oklahoma City, OK 73125

#### AFFECTED AIRCRAFT

All aircraft

#### PURPOSE

The purpose of this notification is to advise all aircraft owners, operators, manufacturers, maintenance organizations, and parts distributors regarding improper maintenance performed on aircraft parts and accessories.

### **BACKGROUND**

Joint investigations conducted by the Federal Aviation Administration (FAA), the Department of Transportation-Office of Inspector General, and the Defense Criminal Investigative Service revealed that Gateway Air Repair, Inc. (Gateway), improperly maintained and approved for return to service various aircraft parts and accessories. Gateway, located at 2000 NW 96th Avenue, Miami, FL 33172, previously held Air Agency Certificate No. QG9R208X with Class 1 and Class 2 accessory ratings, Discrepancies noted in Gateway's practices included:

- Failure to ensure cleaning, inspection, reassembly, and testing to the tolerances and limits of approved technical data.
- Falsification of maintenance record entries.
- Failure to ensure proper qualifications of employees who performed maintenance.
- Failure to use the methods, techniques, and practices, as well as failure to perform work in accordance with current standards and technical data, acceptable to the Administrator.
- Failure to have available the tools and equipment necessary to perform maintenance on parts and accessories approved for return to service by Gateway.

Gateway, which operated as a certificated repair station between October 2001 and December 2003, represented itself as having the capability to maintain the attached list of parts and accessories.

### RECOMMENDATIONS

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

Further information concerning this investigation and guidance regarding the above-referenced parts and accessories may be obtained from the FAA Flight Standards District Office (FSDO) given below.

In addition to the above recommendations, the FAA would appreciate any information concerning the discovery of the parts, the means used to identify the source, and the action taken to remove any part from service.

This notice originated from the Miami FSDO, 8600 NW 36th Street, Suite 201, Miami, FL 33166, telephone (305) 597-7681, fax (305) 716-3456; and was published through the FAA Suspected Unapproved Parts Program Office, AVR-20, telephone (703) 668-3720, fax (703) 481-3002.

## UNAPPROVED PARTS NOTIFICATION

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

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

No. 2001-00056 April 7, 2004

Published by: FAA, AIR-140, P.O. Box 26460, Oklahoma City, OK 73125

#### AFFECTED AIRCRAFT

Any aircraft having the Frantz oil filtration system installed under FAA-STC SA695CE or any other approved FAA-STC oil filtration system of similar design.

### **PURPOSE**

The purpose of this notification is to advise all aircraft owners, operators, maintenance entities, manufacturers, and parts distributors regarding Frantz oil filter elements (part no. 5562) and Frantz oil gasket seals (part no. 5560) produced without Federal Aviation Administration (FAA) production approval and offered for sale for installation on type-certificated aircraft.

### BACKGROUND

Information received during an FAA Suspected Unapproved Parts (SUP) investigation indicated that George Walker Enterprises, Inc. (GWE), 20276 South Oakmont Lane, Oregon City, OR 97045-9455 had produced and sold the Frantz oil filtration system without FAA production approval. GWE sold the parts (see parts list below) from about January 1998 until January 2001.

### RECOMMENDATIONS

Regulations require that type-certificated products conform to their type design. Since the location of these parts is unknown, we encourage all aircraft owners, operators, maintenance organizations, manufacturers, and aircraft parts distributors to inspect their aircraft and/or aircraft parts inventory for parts manufactured by GWE. Appropriate action should be taken if the referenced parts have been installed on aircraft. If any existing inventory includes these parts, the FAA recommends that you quarantine the parts to prevent installation on aircraft until a determination can be made regarding their eligibility for installation.

### **FURTHER INFORMATION**

Further information concerning this investigation may be obtained from the FAA Manufacturing Inspection District Office (MIDO) 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 them from aircraft and/or stock.

This notice originated from the FAA Seattle MIDO, 2500 East Valley Road, Suite C-2, Renton, WA 98055-4099, telephone (425) 227-2170, fax (425) 227-1159; and was published through the FAA Suspected Unapproved Parts Program Office, AVR-20, telephone (703) 668-3720, fax (703) 481-3002.

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Back issues of the Update Report are now on-line! Missing a prior issue? Issues of the Update Report are being added to the ASA web site shortly after they are published.

2004	
Apr. 20-22	* MRO, Atlanta, GA. See http://www.awgnet.com/conferences/mromain.htm
May 18-20	*AS3 and GSE, Las Vegas, NV. See http://www.gseexpo.com/gseexpo/index.po
June 27-29	*ASA Annual Conference, Ritz-Carlton Hotel, San Francisco, CA. See http://www.aviation suppliers.org/training/Conference_04.htm for details
Aug 21-24	ACPC, Marriott Marquis Hotel, New York, NY. See http://www.acpc.com for details.
Sept. 14-16	MRO Europe, Copenhagen, Denmark. See http://www.awgnet.com/conferences/meumain.htm
Nov. 7-9	MARPA Conference, Mission Palms Resort & Conference Center, Tempe, AZ. See http://www.pmamarpa.com

Do you have suggestions for what you'd like the Association to focus on for 2004? Now is your opportunity to let us know what you need! Please do not hesitate to contact the Association by phone, fax or email if you have suggestions or items that you'd like us to concentrate on in 2004.

734 15th Street, NW, Suite 620 Washington, DC 20005 Telephone: (202) 347-6899 Facsimile: (202) 347-6894

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