

The Update Report

The Aviation Suppliers Association

Volume 12, Issue 9

October 15, 2004

REGULATORY UPDATE

FAA Issues 8130.21D

The FAA has issued the long-awaited revision to the 8130.21 Order, which is the FAA order that describes how to complete an 8130-3 tag. This new order includes both benefits and challenges for ASA members.

Despite the legal limitations on affecting the public through the FAA's internal orders (they are not supposed to affect legal rights of persons outside of the government), the reality is that the fate of aircraft parts distributors is often tightly bound up with the language of order 8130.21D.

While the 8130-3 is technically an 'optional' document, the FAA has approved so many quality systems that demand the 8130-3 as a prerequisite to receiving that it can be difficult to sell certain types of otherwise airworthy parts in the United States without a ready source of 8130-3 tags.

Many distributors rely on FAA Designated Airworthiness Representatives, or DARs, to issue the 8130-3 tags where appropriate. Order 8130.21D affects these transactions because DARs may only issue the 8130-3 tag in accordance with that order.

There are many changes in the Order that affect ASA members and this article details them, but it is worth noting two changes at the outset. First, in a subtle change of great import to ASA members, DARs may use part markings or documentation to identify the

part. Second, the new order requires that the 8130-3 tag include the appropriate production certificate number or (for PMA and TSOA parts) the project number associated with production approval. Each of these two significant changes is described in this article.

Trace to the PAH

Many ASA members have experienced problems with the domestic 8130-3 tag language that appeared to require a DAR to establish positive traceability through both documentation and part marking:

The airworthiness of the part, appliance, or product must be established, as well as positive traceability to a PAH via acceptable documentation such as shipping documents or certificates of conformance, and part markings (part number and/or trademark).

Many DARs and FAA employees interpreted this language to mean that documentation (for example, shipping documents, manufacturer's certificates of conformance, or aftermarket part or material certification) and also part marking were both necessary prerequisites to the issuance of the 8130-3 tag. Frequently, though, parts were either unmarked (because manufacturers do not mark every part) or they were properly marked but typically did not bear documentation (like PMA parts, which

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Congratulations to the following companies:

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 Camarillo, CA

Turbine Engine Consultants
 Diamond, MO

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



A Message from ASA's President

The FAA has issued the new version of Order 8130.21D (instructions for completing the 8130-3). It includes several changes that ASA requested but the most striking fact is that there are still significant impediments to obtaining this document that have nothing to do with the airworthiness of the part.

One of the most recently added impediments is the requirement to include the PC number or the project number related to the part. This is a research task that has no relationship to the airworthiness of the part. It is easy to see a PMA holder's approval letter and supplement—they are often proudly posted on a PMA holder's website. But these documents typically do not include the project number on them—so it may be difficult to obtain the project number. The project number, by the way, is assigned when the application process is begun so it has no real bearing on whether a final production approval was issued (e.g. the PMA application could be unfinished or abandoned but there would still be a project number).

Speaking of the 8130-3 tag, we are continuing to work with our contacts to get the export 8130-3 tag petition docketed. Docketing is the first step to getting a fair regulation that permits distributors to apply for the export 8130-3 tag—a business necessity now that the FAA has stated explicitly (in 8130.21D) that the domestic 8130-3 tag may not be used for export purposes.

Bear in mind that if your foreign customer is willing to accept the domestic 8130-3 tag as a sufficient statement of airworthiness, then the FAA has no right to prevent you from using the domestic 8130-3 tag for that purpose.

United Airlines is still in bankruptcy and US Airways has returned for the second time in two years. Worse news is that rising fuel costs and other financial issues have caused several other air carriers to

consider the legal protection of bankruptcy. The fact that these carriers are all seeking to streamline their operations in hopes of emerging from bankruptcy as more efficient operators is good news for the transportation industry as a whole, but it is terrible news for those distributors who have extended credit to these air carriers—credit that is likely to be voided by a bankruptcy court. It has been three years since our last series of articles on bankruptcy—next month's issue of the Update Report shall include an article on bankruptcy to help ASA members deal with the issues facing the industry.

Best Regards

Michele Dickstein

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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.

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New Guidance Corrects Some 8130-3 Problems

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bear markings that convey the same information that could otherwise be conveyed by documentation). Under this interpretation, many parts were deemed to be ineligible for the 8130-3 tag, despite the fact that they could be shown to be airworthy parts manufactured under appropriate domestic production approvals.

ASA asked for this problem to be solved shortly after the 'C' revision (and several times thereafter). The FAA promised to solve this problem in the 'D' revision and has made good on their promise. The FAA has corrected this problem by changing the 'and' to

an 'or.' The language in the guidance now directs the DAR to review either documentation *or* part markings (one or the other) in order to verify the source of manufacture. This makes it clear that either documentation *or* part markings may be acceptable means by which to establish positive traceability to a production approval holder.

DAR SNAFU

DARs issue domestic 8130-3 tags. However, the designee oversight board recently began to rescind the privileges of DARs who were using their DAR privileges to issue domestic 8130-3 tags. The reason for this was a simple

error in copying FAA guidance.

DARs who hold their privileges as a delegation from the FAA's Flight Standards Service (known as maintenance DARs, or DAR-Ts) issue domestic 8130-3 tags for parts in a distributors' inventory under "function code 23;" function codes are the way that the FAA distinguishes and issues DAR privileges. Recently, the FAA moved the DAR function codes from Advisory Circular 183-35 to FAA Order 8100.8. In doing so, though, the language of function code 23 was miscopied – making it appear that function code 23 no longer supported the issuance of domestic 8130-3 tags for aircraft parts.

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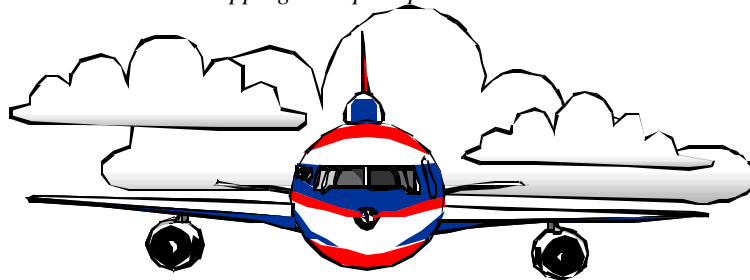
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New Requirement: Add Production Approval Number to 8130-3

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When ASA brought this issue to the attention of FAA Headquarters, they immediately recognized it as a mistake. Because this mistake cannot be corrected immediately in the designee order, the FAA has made the situation clear by stating directly in Order 8130.21D that DARs with function code 23 privileges may issue domestic 8130-3 tags for deserving parts.

Dual Release

There have been some misunderstandings in the past about how to complete block 19 for dual-release approval for return to service. In particular, there were some people who believed that it was not correct to check both of the boxes in block 19. This was incorrect, and the latest version of the guidance makes the situation clear: it is permissible to check *both* boxes in block 19.

When should both boxes be checked? If the work has been completed in accordance with United States standards and *has also been completed in accordance with non-U.S. standards* (e.g. pursuant to JAA/EASA standards), *then both boxes in block 19* should be checked. When the 'other standards' box is checked, then the appropriate non-U.S. standard(s) should be specifically identified in Block 13.

This does not mean that any repair station is particularly obligated to perform work under both standards. A repair station with dual release authority may choose to perform the work under only one standard. For example, if an airworthiness directive exists in one jurisdiction but no similar remedy has been issued in the other, then it may be appropriate to sign off the airworthiness directive work as being performed under the laws of only the first jurisdiction (particularly if the airworthiness

directive reflects a major repair or major alteration and the underlying data has not been approved in the second jurisdiction).

Because dual-release-capable repair stations are not required by regulation to perform work under both standards, distributors expecting dual release tags should review their work orders and contracts to assure that they are properly requesting dual release tags from their JAA/EASA-accepted repair station business partners.

Production Approval Number

8130-3 tags issued by a DAR for a part in an accredited distributor's inventory must now include additional information about the production approval holder who produced the part. Block 13 (the remarks block) should state:

"The part(s) shipped under this approval were produced by [insert Production Approval Holder's name, certificate or project number, and address]."

The 'certificate or project number' requirement is already causing some confusion among distributors. For parts manufactured under a production certificate (PC) number. For parts manufactured under a Parts Manufacturer Approval (PMA) or Technical Standard Order Authorization (TSOA), the *project number* will be required.

The PMA or TSOA project number is assigned when the manufacturer's application progress begins and it is not strictly a production approval number. Instead, it is a number used to track an FAA approval process. Because it has

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YOUR ASSOCIATION IN ACTION

2004 Workshop Schedule

ASA is taking its show on the road this Fall!

In addition to bringing you the latest changes and standards on regulatory compliance, documentation, traceability and approved/unapproved parts, this year's Workshop will feature units on how to use commercial documents like your invoices and purchase orders to protect your rights, as well as an in depth look at export standards, and changes in export documentation expectations, and how these issues are affecting domestic markets as well.

October 28	Chicago, IL
November 5	Phoenix, AZ
November 30	Ft. Lauderdale, FL
December 2	Newark, NJ
December 7	Seattle, WA
December 9	Greater Los Angeles Area, CA

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A.J. Levin Company: All in the Family

Family owned businesses are a rare breed these days; yet somehow A.J. Levin Company has maintained that course for over 65 years. Since 1938, even as the aviation industry evolved, there are several general business ideals that do not change, namely keeping customers a priority, and unrelenting attention to quality. Keeping the books balanced, making money and retaining your better employees, all have remained key business constants in A.J. Levin Company's business.



Abe Levin is on the right.

Abe Levin started his career in the motion picture business as the foreign car mechanic at Warner Brother's Pictures responsible for their Rolls Royce automobiles. His keen skills as an auto mechanic allowed Abe to also maintain the personal airplane for the Head of Transportation at Warner. After a few years working on the motion picture side, Abe decided it was time for a change and was hired by Lockheed Aircraft Corporation as an airplane mechanic.

Not entirely satisfied working for someone else, Abe started Aerolite Company in 1938. He focused on purchasing broken down airplanes and sold the "spare" parts, sold manufactures new parts and anything else airplane related. Sometime during the late 1940's Aerolite Company became the A.J. Levin Company.

Because of Abe's early affiliation and experience with Lockheed, A.J. Levin Company had thrived on Lockheed Aircraft spares business throughout most of the 90's; until Lockheed moved. Now what? Richard Levin, Managing Director and third generation owner of A.J. Levin Company, knew he wanted to stay within the commercial aircraft sector, albeit with limited options. In a well defined supply chain market, Richard recognized an opportunity and focused on Airbus.

When asked how things have changed for A.J. Levin since then, Richard replied "In that short time everything else has changed beyond recognition, and the pace of change continues to accelerate as we enter a new century and millennium. Indeed, staying ahead of change, and keeping on top of new trends, technologies and opportunities has become the great challenge for most businesses, certainly my own. The changes we face are two fold and in many ways are inter-related"

The first, according to Richard, is the continued structural evolution of the commercial aviation spares aftermarket. For the last 25 years the industry has witnessed change as Airlines have consolidated, gone out of business, and grappled with fundamental change in market structure. Air transport deregulation in 1978 in the Carter administration started the process which resulted in many familiar airline names, Pan Am, Eastern, Peoples Express, Piedmont, Republic, PSA etc. disappearing. Richard continued to explain that, "Today, the process continues apace, and we face the prospect of more names disappearing worldwide, and new names solidly establishing themselves, i.e. Southwest, AirTran, jetBlue, Easyjet, RyanAir, Jetstar etc."

He added, "This process of consolidation has forced spares and services

suppliers to consolidate, and forced many out of business altogether. Those remaining face strong pressures to offer broader ranges of products and value-added services that enable customers to realize additional "soft cost" savings. This is probably the greatest challenge a company like us faces today."

Richard describes other forces driving change in our industry which are globalization and technological change. These forces have added new dimensions of complexity for large and small firms. By way, of example, A.J. Levin Company as a Lockheed aircraft spares distributor, conducted business with a supplier literally down the street from them. Today, as an Airbus Industrie aircraft and suppliers. The vast majority of their contacts are in Europe, where they deal in a variety of different languages and currencies, and face importation costs and duties etc.

Growth-minded companies like A.J. Levin Company have embraced these changes, and sought to create opportunities out of them. They are focused on continuing to grow their business by remaining focused on what Richard calls their three pillars of business;

- Quality and satisfying customer needs,
- Inventory - continuously developing their product line, and
- Technology and global-mindedness

No successful company is without an outstanding team who strive to keep the A.J. Levin "pillars of business" standing. As Richard explains, "It is through our team efforts that success cannot be had without the innovation and never fearing to embrace change while seeking new frontiers," which has become a core value for A.J. Levin Company.

Richard Levin currently sits on the ASA Board of Directors and A.J. Levin Company has been a member of the Association since March 1995.

8130.21D Poses New Challenges

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little legal use after the approval is issued, many manufacturers do not use these numbers after the approval is issued. Manufacturers typically have not published these project numbers, because previously there was no commercial need for them.

Under the most recent changes to the 8130.21D order, manufacturers now must place their PC and project numbers on the 8130-3 tag when they proffer it to a designee for signature, and distributors who seek 8130-3 tags from DARs must also use these numbers. In addition to the block 13 text, the numbers should be found in block 4.

ASA has discussed this new policy with David Broughton of the FAA. Broughton has explained that the purpose is to confirm that the part was actually produced under the referenced production approval. When ASA explained the difficulties in obtaining project numbers, Broughton suggested first contacting the manufacture to request the project number and then contacting the FAA Manufacturing Inspection District Office (MIDO) that issued the production approval. If neither is able to provide the necessary number in order to complete the 8130-3 tag, then he suggested contacting FAA Headquarters. Distributors experiencing problems obtaining PC numbers or project numbers can reach Dave Broughton at (202) 267-9575. The Manager of that office is Frank Paskiewicz. Please let ASA know if you contact the FAA about this issue, as we would like to be able to track the problems that arise and seek system-wide solutions as necessary.

Changing Places

Several items have been moved to new locations. Many ASA members rejoiced in seeing that the authority for

DARs to issue domestic 8130-3 tags had finally found a permanent home in 8130.21 (added in change 2 to the 'C' revision that document). Do not be alarmed when you notice that it no longer resides in appendix III – the text has simply been moved. The authority for DARs to issue the domestic 8130-3 tag for parts in an accredited distributor's inventory has been moved to paragraph 10(d).

Also moving to a new home in the document are the general instructions, which apply generally to situations in which the tag is used. The general procedures for completing and using Form 8130-3 were relocated from paragraph 13 to paragraph 8.

DARs issuing domestic 8130-3 tags must now indicate the PC number or (for PMAs and TSOAs) the project number. This will pose an additional burden on distributors applying for such tags.

Status/Work

The term "EXPORT" has been added to the list of terms that may be used in block 12 (the 'status/work' block). It is used when the sole function of the form is for the export of a Class II or III product.

Remember that although distributors may apply to a DAR for an export tag for a class II article, non-manufacturers are currently ineligible to apply for an export tag for a class III article. ASA is seeking to change this inequity - ASA has filed a petition for rulemaking

seeking permission for all exporters to apply for issuance of the 8130-3 tag for demonstrably airworthy class III materials produced under domestic production approval.

Tags Issued at Manufacturer Facilities

A part that has left a manufacturer's quality system is now eligible to be returned to that manufacturer and a FAA designee at the manufacturer's facility can issue an 8130-3 tag for the part despite the fact that it previously left the manufacturer's quality system. The manufacturer will need to have a process for reintroducing such a part into its quality system, and for inspecting that part.

The stated purpose of this new privilege is to permit manufacturers to issue a new tag when a part is returned because of overstock, wrong model, or retesting.

Potentially, this means that manufacturers, at their option, may establish a means by which distributors can seek to send parts back to the manufacturer so that the manufacturer's designees can issue an export 8130-3 tag. In light of the competitive situation in the industry, it is likely that few manufacturers would choose to do this.

Bilateral Language

The FAA has added requirements to enter a statement in Block 13 identifying certain information about PMA parts when the 8130-3 is completed as an export tag. These informational tags will assure that the importing bilateral nation will accept the FAA's designation of airworthiness.

If the part is not critical, then the words "This PMA part is not a critical component" should be included in block 13.

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UNAPPROVED PARTS NOTIFICATION



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

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>

No. 2003-00211
September 28, 2004

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

AFFECTED AIRCRAFT

Transport category aircraft and rotorcraft.

PURPOSE

The purpose of this notification is to advise all aircraft owners, operators, maintenance organizations, manufacturers, and parts suppliers and distributors regarding engine oil system and fuel system hoses produced without Federal Aviation Administration (FAA) production approval.

BACKGROUND

Information received during an FAA suspected unapproved parts investigation revealed that Western Coupling Corp., 1711 Sabovich Street, Mojave, CA 93501, produced engine oil system and fuel system hoses without an FAA production approval. The following hoses were produced between 1999 and 2002:

P A R T NAME	MODEL/ MANUFACTURER	PART NUMBER	NEXT ASSEMBLY NAME	QUAN- TITY
Hose	Lockheed C-130/ L-382	131040-24-0166	Oil System Return	56
Hose	Lockheed C-130/ L-382	755124-1	Oil System Return	42
Hose	Lockheed C-130/ L-382	156708-24D0166	Oil System Return	13
Hose	Lockheed C-130/ L-382	624162-24D0182	Oil System Return	12
Hose	Lockheed C-130/ L-382	755208-1	Oil System Return	10
Hose	Lockheed C-130/ L-382	131030-24D0182	Oil System Return	9
Hose	Lockheed C-130/ L-382	S36B90081-0182	Oil System Return	4
Hose	Lockheed C-130/ L-382	S36B90082-0166	Oil System Return	2
Hose	Lockheed C-130/ L-382	WC8006P214GT	Oil System Return	6
Hose	Lockheed C-130/ L-382	WC8005P114KT180	Oil System Return	5
Hose	Lockheed C-130/ L-382	755125-1	Oil System Return	2
Hose	Sikorsky S-61	S6130-63003-23	Fuel Line	10
Hose	Sikorsky S-61	S6130-63003-1	Fuel Line	5
Hose	McDonnell Douglas A-4 Skyhawk	AE704924-1		2
Hose	Undetermined	156701-24D0182		9

P A R T NAME	MODEL/ MANUFACTURER	PART NUMBER	NEXT ASSEMBLY NAME	QUAN- TITY
Hose	Undetermined	640011-24-0197		4
Hose	Undetermined	131040-24D-0166		1
Hose	Undetermined	S36B90082-016		1
Hose	Undetermined	090-624168M0250		5
Hose	Undetermined	111271-16D0256		17
Hose	Undetermined	111515-16D0280		17
Hose	Undetermined	111515-24D0194		4
Hose	Undetermined	111515-6S0292		8
Hose	Undetermined	149-50103-0460		16
Hose	Undetermined	149-50108-0256		2
Hose	Undetermined	156001-4S0140		2
Hose	Undetermined	3680800004F0101		1
Hose	Undetermined	3680800006D0154		2
Hose	Undetermined	38B0800006D0154		1
Hose	Undetermined	601000-20D0204		1
Hose	Undetermined	601000-4-0140		5
Hose	Undetermined	601002-4-0070		3
Hose	Undetermined	601002-4-0101		1
Hose	Undetermined	601002-4-0106		1
Hose	Undetermined	601002-4S0070		6
Hose	Undetermined	601002-6D0154		14
Hose	Undetermined	601051-20D0214		1
Hose	Undetermined	624162-4-0210		5
Hose	Undetermined	624166N0167		2
Hose	Undetermined	6844701-123360		1
Hose	Undetermined	6886430E132F110		2
Hose	Lockheed C-130/ L-382	755210-3	Engine Oil Return	7
Hose	Lockheed C-130/ L-382	755211-2	Engine Oil Return	5
Hose	Lockheed C-130/ L-382	755227-1	Engine Oil Return	1
Hose	Lockheed C-130/ L-382	755239-1	Engine Oil Return	5
Hose	Undetermined	94B5700016D0280		4
Hose	Sikorsky S-61	S6130-63003-15	Fuel Line	15
Hose	Sikorsky S-61	S6130-63003-3	Fuel Line	2
Hose	Lockheed C-130/ L-382	WC27369J0282A		24
Hose	Lockheed C-130/ L-382	WC8006M290GAS		24
Hose	Lockheed C-130/ L-382	WC8006M292AA		24

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UNAPPROVED PARTS NOTIFICATION

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



U.S. Department
of Transportation
**Federal Aviation
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UPNs are posted on the Internet at <http://www.faa.gov/avr/sups/upn.cfm>

No. 2003-00066
September 8, 2004

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

AFFECTED PART

Illuminated pushbutton switch found on MD-11 and MD-11F series aircraft.

INTRODUCTION

The purpose of this notification is to advise all aircraft owners, operators, maintenance organizations, manufacturers, and parts distributors regarding the unapproved manufacture of illuminated pushbutton switches by the Eaton Corporation, Aerospace Controls Division.

BACKGROUND

Information received during a Federal Aviation Administration (FAA) Aircraft Certification Evaluation Program conducted at Eaton Corporation, Aerospace Controls Division (Eaton), located at 1640 Monrovia Avenue, Costa Mesa, CA 92627, revealed the unapproved manufacture of illuminated pushbutton switches. The switches are applicable to MD-11 and MD-11F series aircraft and were sold through distributors between 1999 and early 2002. The switches, listed below, were not produced in accordance with FAA requirements for manufacturing replacement parts and are therefore considered to be unapproved.

Part Name	Part Number
Switch	851-35778-105
Switch	851-35778-114
Switch	851-35778-119
Switch	851-35778-121
Switch	851-35778-139
Switch	851-35778-145
Switch	851-35778-148
Switch	851-35778-150

RECOMMENDATIONS

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Eaton Corp. Switches W. Coupling Hoses 8130.21D Changes

(Continued from page 101)

Regulations require that type-certificated products conform to their type design. Aircraft owners, operators, manufacturers, maintenance organizations, and parts distributors should inspect their aircraft and/or parts inventory for any of the part numbers listed above. Suspect switches installed on aircraft should be inspected for conformity to type design. If they are found in existing stock, it is recommended that the switches be quarantined to prevent installation until a determination can be made regarding each part's eligibility for installation.

Effective May 21, 2002, Eaton received an FAA Parts Manufacturing Approval for the referenced switches. The company has agreed to replace and/or credit any referenced switch that is returned.

FURTHER INFORMATION

Further information concerning this investigation, and guidance regarding the above-referenced switches, may be obtained from the FAA Manufacturing Inspection District Office (MIDO) given below. In addition to its recommendations, the FAA would appreciate any information concerning the discovery of the switches, the means used to identify the source, and the actions taken to remove the switches from service.

This notice originated from the FAA Transport Airplane Directorate, Los Angeles MIDO, 3960 Paramount Blvd., Lakewood, CA 90712-4137, telephone (562) 627-5291, fax (562) 627-5293; 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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RECOMMENDATIONS

Regulations require that type-certificated products conform to their type design. Aircraft owners, operators, maintenance organizations, manufacturers, and parts suppliers and distributors should inspect their aircraft, aircraft records, and/or parts inventories for the referenced part numbers. If any are found in existing stock, it is recommended that the hoses be quarantined to prevent installation until a determination can be made regarding their eligibility for installation. Hoses that cannot be traced to an approved source should be considered suspect and appropriate action taken.

FURTHER INFORMATION

Further information concerning this investigation and guidance regarding the above-referenced hoses can be obtained from the FAA Manufacturing Inspection District Office (MIDO) given below. The FAA would appreciate any information concerning the discovery of these hoses from any source, the means used to identify the source, and the action taken to remove any hose from service.

This notice originated from the FAA Van Nuys MIDO, 7120 Hayvenhurst Avenue, Van Nuys, CA 91406, telephone (818) 904-6298, fax (818) 904-6001; and was published through the FAA Suspected Unapproved Parts Program Office, AVR-20, telephone (703) 668-3720, fax (703) 481-3002.

For purposes of this clause, the term critical may be read to mean parts subject to a life-limit, replacement time, or inspection interval under the airworthiness limitations published by the manufacturer. Bear in mind that non-critical PMA parts may be class III items, and distributors are currently forbidden from applying for export airworthiness approval for such articles (ASA continues to promote its petition for rulemaking to correct this injustice).

PMA parts produced under license may be marked as "Produced under a licensing agreement from the OEM." The order requires slightly different language ("Produced under a licensing agreement from the holder [insert "TC" or "STC"]"), however the "OEM" language is the language actually required by the bilateral agreements. How this discrepancy gets ironed out may be subject to the interpretation of the FAA's local offices.

Conclusion

There are many small changes in the 'D' revision to Order 8130.21. The two most likely to affect distributors are:

- 1) The change that permits distributors to submit markings for documentation to verify traceability to a production approval holder (instead of requiring both); and,
- 2) The new requirement to obtain the production certificate or project number and add it to the 8130-3 tag.

ASA has already opened a dialogue with the FAA over the most recent revisions. Distributors who are dissatisfied with the most recent revisions, or who experience problems in the implementation of this guidance, should contact ASA immediately so that we can address your concerns.

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UPCOMING EVENTS * = Look for ASA Personnel on the speaking program or on the Trade Floor. (For additional information on each event, click on the appropriate link below.)

2004

- Oct. 28** * **ASA Regulatory Workshop**, Chicago, IL. See <http://www.aviationsuppliers.org> for details.
Nov. 5 * **ASA Regulatory Workshop**, Phoenix, AZ. See <http://www.aviationsuppliers.org> for details.
Nov. 7-9 * **MARPA Annual Conference**, Phoenix, AZ. See <http://www.pmamarpa.com>
Nov. 30 * **ASA Regulatory Workshop**, Ft. Lauderdale, FL. See <http://www.aviationsuppliers.org> for details.
Dec. 2 * **ASA Regulatory Workshop**, Newark, NJ. See <http://www.aviationsuppliers.org> for details.
Dec. 7 * **ASA Regulatory Workshop**, Seattle, WA. See <http://www.aviationsuppliers.org> for details.
Dec. 9 * **ASA Regulatory Workshop**, Los Angeles Area, CA. See <http://www.aviationsuppliers.org> for details.

2005

- June 26-28** * **ASA Annual Conference**, Boca Raton Resort & Club, Boca Raton, FL
See <http://www.aviationsuppliers.org> for details.

ASA Workshops are coming up this Fall – topics will include supporting the customers' regulatory obligations, documentation, traceability, approved/unapproved parts and export issues. Have you reserved your seat yet by registering?

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