



The Update Report

The Airline Suppliers Association

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October 2000

REGULATORY AFFAIRS

Watch Your Life-Limited Parts!

Do you maintain life-limited parts in your inventory? Under a new FAA-proposed rule, distributors handling surplus life-limited parts could find themselves out of business in a hurry!

The FAA has proposed a rule that would require a measure of control over life-limited parts when they are removed from an aircraft, when they are segregated, and when they are 'dispositioned.' This is based upon legislative language from the 2000 FAA Reauthorization. Although the legislation upon which this rule is based is reasonable, the FAA's implementation of that legislation is not.

The main problem with the proposal is that it has been implemented through Part 43 of the regulations. Part 43 encompasses regulations that apply to maintenance, preventive maintenance, rebuilding and alteration. Unregulated activities, like removal of parts, or handling of parts, are not (yet) addressed through this Part. Activities covered under Part 43 may only be carried out by persons with FAA certificates, and these activities generally are required to be documented through an approval for return to service that is signed by a certificated person.

There has been a running debate in some sectors of the government concerning whether removal of parts should be a regulated function. Addi-

tionally, some people outside the industry have suggested that unregulated distributors should not be permitted to handle life-limited parts.

By placing the proposed regulations into Part 43, the FAA would create an atmosphere of confusion that can only serve to harm the industry.

The FAA's proposed rule raises a logical presumption that removal or handling of parts is a maintenance activity, and that it should be regulated as such. This means that if a person wants to remove a life-limited part from an aircraft, that person needs to be an A&P mechanic or an employee of an air carrier or a properly rated repair station.

Despite the fact that the proposal is limited to life-limited parts, common experience with the FAA suggests that an interpretation of "maintenance" that includes parts removal and handling would be broadly applied to all parts. In fact, the regulation's preamble specifically states that the "removal, storage, and disposal of parts is closely related to the maintenance of aircraft." This is an incorrect statement, but it sets the stage for establishing regulations that would permit only repair stations and air carriers to handle and store parts. The use of the term 'dispositioned' in the regulation is particularly danger-

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ASA
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A Message from ASA's President

Last week, ASA's Board of Directors held their 4th quarter meeting at ASA's headquarters. The Board focused on the business issues affecting ASA. In addition to the Board's financial responsibilities regarding the 2001 budget, the directors also began work on:

- a new long range plan that reflects ASA's growth and goals;
- modifications to the accreditation program;
- approval of the hazmat training program;
- a review of member needs and better ways for ASA to meet those needs;
- a review of on-going projects.

ASA's priority is government affairs and the Board reviewed the government affairs activities and concurred with Jason Dickstein that the proposed NPRM regarding marking of life limited parts as drafted does not support the intent of the law and is detrimental to parts distributors. ASA will keep the membership informed so we can be sure to let their voices be heard among the comments on the NPRM.

There were two member issues brought to the Board's attention; one issue being the use of ASA's logo and the other issue concerning the rules regarding member votes. The logo issue has been raised at prior Board meetings and at the 2000 member meeting. Presently, ASA has two versions of the logo. One that ASA uses and one that ASA licenses to ASA-100 accredited companies for use. The licensed logo has the words "Accredited" on the top of the logo. The first item of business at the 2001 1st quarter Board meeting will be to discuss expanded usage of the logo. If you would like for the Board to consider your comments, please submit them via fax to ASA by December 31, 2000.

The Board discussed the rules regarding member voting and decided to publish the existing rules that ASA follows regarding privacy issues associated with individual ballots so the membership understands how the existing system helps ensure confidentiality.

Prior to the Board meeting, ASA's Quality Assurance Committee held a meeting in the DC area. Led by Larry Collings and Jay Rosenberg, the committee discussed with government officials proposed hazmat rules, unapproved parts issues, manufacturing issues, documentation, parting-out of aircraft and other related regulations and guidance materials that affect distributors' quality systems.

The group reviewed a proposed change to ASA-100. Over the past year the group has submitted to the Board of Directors several proposed changes to ASA-100, all of which have been approved. Jason Lewis anticipates publishing the revised standard no later than December 1, 2000.

Best Regards

Michele Schweitzer

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The Update Report

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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 Airline 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

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Just Click on the Dotted Line

Many of us remember the glowing prophecies of the “paperless office” that accompanied the widespread introduction of personal computers into the workplace. Paper files were going to begin their long march into the dustbin of history as more and more business was conducted electronically. A good ten years later, those file cabinets are still looking pretty full. In fact, sales of office paper have actually *increased* by 30% during that period, as fast as you could click on the “print” button. The main reason for this phenomenon is that people still *trust* paper—it never goes down, it never locks up, and it is immune to hackers. This trust has long been enshrined in our legal system as well. In order to be legally enforceable, many significant transactions—for example, a sale of goods costing \$500 or more—must be memorialized in writing, and signed by at least one of the parties involved.

The historical requirement for actual, physical signatures on many types of documents has slowed the growth of e-commerce. On October 1st, however, the truly paperless office moved a step closer when the Federal Electronic Signatures in Global and National Commerce Act, or “E-Sign,” went into effect. E-Sign recognizes electronic signatures and records as legally binding and encourages the use of on-line contracts and notices. At least 21 states have already enacted some form of electronic signature legislation. Most of them are patterned after the Uniform Electronic Transactions Act, a model law drafted by the National Conference of Commissioners on Uniform State Laws. E-Sign takes e-commerce one step further by providing a nationwide legal framework that will make it possible to conduct electronic transactions across state lines or internationally.

E-Sign is fairly general in scope, representing “enabling legislation” that is designed to lay the groundwork for further developments. Its central tenet is that electronic documents and signatures will have equal legal footing with their physical-world counterparts—in the words of the Act, their “legal effect, validity, or enforceability. . . shall not be denied” solely on the ground that they are in electronic format. E-Sign, moreover, is “technology-neutral,” meaning that it does not specify any particular manner or system for creating electronic signatures or documents. Indeed, “electronic signature” is defined very broadly: “information or data in electronic form, attached to or logically associated with an electronic record, and executed or adopted by a person

or an electronic agent of a person, with the intent to sign a contract, agreement, or record.” This definition would encompass even something as simple as clicking an “I accept” button on a web page.

A number of state laws have taken a more specific approach, mandating the use of a particular type or electronic signature known as the “digital signature.” Digital signatures are created using “dual key” technology, in which a trusted third party known as a “digital certificate authority” issues personal encoded digital “keys” to individuals. These keys enable parties to an on-line transaction to verify each other’s identity. Digital encryption software is widely available com-

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AIRCRAFT PARTS AROUND THE WORLD

Irish Nab Counterfeit Parts

It was Thursday morning. Anxiously drinking coffee and checking watches, 150 Irish police officers waited impatiently for Operation Phoenix to begin. Their target: counterfeit aircraft parts.

Operation Phoenix was a major investigation conducted by the Irish National Police, which is known as ‘An Garda Siochana.’ Garda, whose officers are known as Gardai, searched twelve locations on Thursday, October 5. They searched for counterfeit aircraft parts as well as documentation and other evidence concerning such parts. The twelve Irish locations were in Ennis, Limerick, Raheen, Six-mile-bridge and Shannon, and they included homes and offices as well as a warehouse. The simultaneous operation included 150 Gardai from five different divisions of Garda, as well

as eight FBI agents who were present as observers.

The operation was conducted jointly with the United States authorities, who were conducting their own fraud investigation concerning counterfeit aircraft parts received in the United States. The United States interest stems from the allegation that the investigated party allegedly sold counterfeit aircraft parts to aircraft maintenance and repair facilities. The searches were conducted as a cooperative effort under Ireland’s Forgery Act of 1913.

At one warehouse in Shannon, the Garda may have struck paydirt: the 6,000 square foot facility was sealed off and Gardai have begun to examine the contents carefully. Garda Inspec-

(Continued on page 114)

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(Continued from page 113)

tor Simon O'Connor explained (as reported in the Irish Times) that "It's a huge operation which could take up to six weeks to complete as thousands of parts were found at the premises. Gardai will categorise[sic] everything and then trace where they originated from." The warehouse was identified as being connected to Smyth Aerospace Manufacturing.

The Irish Aviation Authority (Ireland's version of the FAA) is also cooperating in the investigation. The IAA told the Irish newspapers that the investigation began as a military parts investigation, but the Authority is now investigating whether any counterfeit parts may have been supplied to the civilian aviation industry, as well. Smyth Aerospace Manufacturing apparently sold parts for 737s, 747s, DC-10s, F-4s and A-37s. The Irish Air Corps has grounded fourteen Cessna and Marchetti aircraft believed to contain parts indirectly acquired from Smyth.

(Continued from page 111)

ous. The term is defined in the FAA Reauthorization Act to include segregation of parts and destruction of parts. Imagine if the FAA could fine you \$1,100 for scrapping-out an un-airworthy part from your inventory!

The rule is based on new law. The law upon which the regulation is based represents an appropriate set of instructions for handling life-limited parts. It codifies existing parts handling procedures and it excludes no one from participation in the industry. The problem is that by commingling that provision into Part 43, the FAA muddies the waters. The FAA creates the appearance that there are additional provisions associated with the handling of life-limited parts: the maintenance provisions found in Part 43 of the regulations.

The current inconsistency problems experienced among FAA personnel are well known. By including the life-limited parts handling provision in the maintenance Part, it is practi-

cally guaranteed that FAA employees will enforce the regulations to mean that non-certificated distributors are not permitted to handle (disposition) life-limited parts.

How is this likely to affect distributors? FAA inspectors will probably not bring many enforcement actions against distributors. Instead, it is most likely that FAA inspectors will require repair stations and air carriers to adopt policies that preclude the sale of life-limited parts from their inventories to distributors. It is also possible that these policies could preclude them from buying life-limited rotables from distributors.

No matter how it is implemented, it is likely that this confusing implementation will adversely affect the business of distributors. The regulation does not need to be defeated; instead it merely needs to be changed. ASA plans to fight to modify the regulations. Watch ASA's website for model response language that you can use to help draft your own response.

European Aviation Safety Authority Continues to Take Shape

Distributors doing business abroad have long had to contend with a variety of differing technical requirements and administrative procedures in the countries in which they do business. This has been true in Europe despite the ongoing efforts of the FAA and Europe's Joint Aviation Authorities (JAA) to bring about greater harmonization of regulations and requirements on both sides of the Atlantic. To help establish common standards throughout Europe, the European Commission is moving forward with plans to create a new European Aviation Safety Authority (EASA).

Currently, aviation regulations in Europe are set by each European country's own civil aviation authority (CAA). A non-governmental organization known as the JAA was established in 1990 for the purpose of har-

monizing the aviation regulations among the European CAAs. It was created under a treaty known as the Cyprus Agreement. While this arrangement promotes uniformity among the European regulations in theory, in practice the Europeans have found it difficult at times to promulgate new harmonized regulations under this system because of political factors.

The answer to the dilemma is to establish a single regulatory authority with broad powers to regulate international aviation throughout Europe, in cooperation with the European CAAs.

On September 27th, the European Commission adopted a proposal establishing certain parameters for EASA. EASA would be set up as a formal agency of the European Union.

This official status will give the new organization legal authority that the JAA never had.

The European Commission began to formally discuss the creation of EASA in 1996. EASA was envisioned as a centralized European body modeled on the FAA in the United States, responsible for ensuring a uniformly high level of aviation safety in Europe through the gradual integration of national systems. Additionally, EASA would ensure the free movement of aeronautical products, personnel and services throughout Europe by making possible the automatic recognition of certificates and approvals issued by any duly authorized national aviation authority.

The European Community's aim in

(Continued on page 117)

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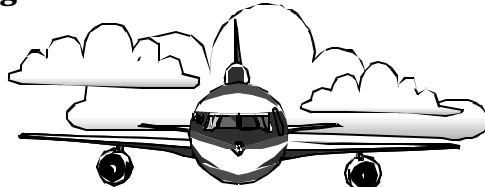
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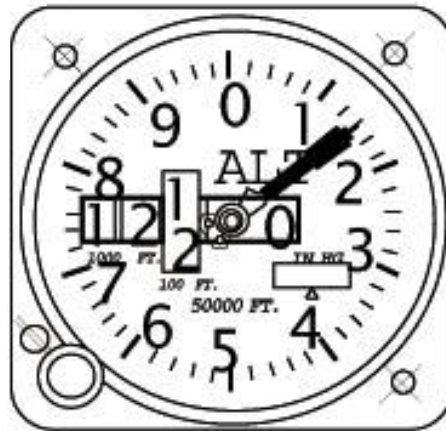
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EASA: One Step Closer to European Aviation Unification

(Continued from page 115)

creating EASA is to establish a common set of rules for the certification and maintenance of aeronautical products, and ensure that they are uniformly implemented in all Member States. One of their stated aims is to avoid situations in which manufacturers are forced to produce different versions of the same aircraft or equipment depending on the country in which it will be used. Greater harmony among the European nations will aid distributors, by making it easier to understand the European regulations and policies when exporting parts to EASA member states.

Under this new system, the automatic recognition of certificates and approvals would be achieved through a two-pronged approach. The CAAs (national-level authorities) would continue to issue individual certificates/approvals for products, personnel, and organizations, but would do so subject to EASA oversight. EASA would employ "common conformity verification procedures" (or "codes of navigability" in Eurospeak) to ensure that rules were being enforced uniformly from country to country. At the same time, EASA itself would have the authority to verify conformity with common standards and to issue standard type certificates for aeronautical products, as well as perform other functions normally done at the national level, if so requested. As a practical matter, EASA would probably become the primary authority for issuing type certificates.

EASA's initial role would be to draft and adopt common technical rules and administrative procedures for the design, construction, continuing airworthiness, maintenance and operation of aircraft, as well as certifying the personnel and organizations per-

forming these activities. EASA would also conduct technical inspections and issue type certificates for aeronautical products, verify the implementation of common rules by the Member States, and develop requirements and procedures for applying environmental standards.

The European Commission has also laid the groundwork for a later expansion of the EASA's authority. Future legislation is planned that would broaden its powers to include oversight over the security of aviation operations, flight crew licensing, airport operations, and air traffic management. For the present at least, there are no plans for the EASA to assume responsibility for airport management.

The executive director of the EASA would have extensive decision-making authority on safety issues. This feature of the Authority found strong support from both industry and national authorities, mainly due to past concerns that the JAA had proven ineffective in overcoming political interference and national concerns in their decision making. Supporters of the new approach argue that having a single decision-maker, along the lines of the FAA Administrator in the United States, will streamline individual decisions such as the granting or withdrawal of certificates. Nations that disagree with the decisions of EASA will be able to appeal them to the European Court of Justice.

Non-European Community countries will also participate in the new system. In order to ensure that the benefits of improved safety and common standards apply as widely as possible throughout Europe, the Commission's new regulation stipulates that non-EC countries be allowed to participate in the work of the Authority on essen-

tially the same footing as Member States. This feature was included in response to concerns by nations like the United Kingdom, who noted that some European nations are not members of the European Community.

The Authority's annual budget, once it is fully operational, will be an estimated 28.7 million euros (roughly \$25 million at the current exchange rates), provided by a combination of user fees and contributions from the European Community budget. The seat of the new Authority has yet to be finally decided, but the Netherlands has offered to host it (this is where the JAA is headquartered).

While the specifics of the EASA rules will not become known for some time, the establishment of a single European authority could have a significant effect on the relationship with the United States. The FAA has been working with the JAA since 1992 to harmonize FAR and JAR requirements. Within Europe, all 19 JAA member countries and 10 candidate member countries mutually recognize JAA certificates. United States law has precluded the FAA from participating in the blanket mutual recognition scheme, because the JAA is not a government with which the United States may enter into a treaty, and because the JAA never had the legal authority to bind the European governments to any agreements. The creation of a single European Authority with direct legal authority could mean that individual European countries may speak with a single voice when dealing with the FAA. The result would likely be greater clarity and a single set of requirements for anyone doing business in more than one European country.

Just Click on the Dotted Line

(Continued from page 113)

mercially (Pretty Good Privacy, or "PGP," being probably the best known example) and is considered one of the most secure ways to conduct business on the internet. E-Sign pre-empts many specific provisions in state laws, meaning that other types of electronic signatures would be valid even in a state that had a digital signature law. Still, the bottom line is that E-Sign leaves the choice of method up to the parties. If both parties choose to use digital signatures, for example, so much the better — the only requirement is that both sides agree on a particular method at the outset and stick to it.

While E-Sign encourages the use of electronic signatures and documents, it by no means requires it. The Act provides significant "opt out" provisions requiring that both parties explicitly and conspicuously consent to conduct business electronically, and clearly spell out the hardware and software necessary to create, transfer, store, and access the resulting electronic record. If at any time one of the parties withdraws their consent, the transaction has to revert to the traditional world of paper.

Not all documents are ready to go electronic. Hazardous material docu-

mentation is one example of paper-work that will have to remain in paper form for the foreseeable future. E Sign specifically excludes a variety of other legal documents as well, such as wills; documents governing divorce, adoption, or other family law matters; some legal documents governed by the Uniform Commercial Code (but contracts for the sale or lease of goods are covered under ESign); court orders or notices; notices of termination of utility service; eviction notices; or notice of termination of insurance benefits, among others. Paper will continue to be with us for some time for these purposes.

Nevertheless, the legal road is now largely clear to begin buying and selling goods without the use of paper contracts, invoices, and notices. The potential for time and cost savings are huge. Indeed, business-to-business ("B2B") e-commerce has proven to be the fastest growing sector of the so-called New Economy. The bottom-line question is one of trust and risk management. Security of on-line transactions is always a concern, and hackers and other unscrupulous characters will always pose a certain risk. Yet many of the protections that apply to traditional transactions continue to apply in the electronic realm. E-Sign, for example, specifies that forged

electronic signatures can be contested the same ways any written forgeries would be.

The technological foundation for e-commerce is already in place. For many years, companies have made electronic databases of parts available to the industry. ILS started making parts lists available through electronic means as early as 1979. Since that time, other companies like ABD Online, Avolo.com, Bcomm, ComponentControl.com, Partsbase.Com, Spec2000 and TradeAir.com have joined the industry and helped to push the envelope of e-commerce services. Several of these companies are already establishing systems that would enable aircraft parts transactions to be fully negotiated and completed online. The new E-Sign law helps support these transactions by confirming the validity of the agreements that are transacted on-line.

At a certain point, every business finds itself in a position where the benefits of e-commerce outweigh the risks. E-Sign helps to bring that point closer for many of us. The paperless office may still be some ways over the horizon, but an office of less paper is already well within reach.

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Complete conference agenda and registration details will be posted on our website early 1st quarter 2001.



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UNAPPROVED PARTS NOTIFICATION



U.S. Department
of Transportation
**Federal Aviation
Administration**
No. 98-071
Revised
September 20, 2000

SUSPECTED UNAPPROVED PARTS PROGRAM OFFICE, AVR-20
45005 AVIATION DRIVE, SUITE 214
DULLES, VA 20166-7541

UPNs are posted on the internet at <http://www.faa.gov/avr/sups.htm>

Published by: FAA, AFS-610, P.O. Box 26460, Oklahoma City, OK 73125

AFFECTED AIRCRAFT

This *revised* Unapproved Parts Notification clarifies the engine make and models numbers below.

American General: AA1A, AA1B, AA5A, AA5B

Beechcraft: 19A, 23A, 24R

Bellanca: 7GCAA, 7KCAB, 8GCBC, 8KCAB

Cessna: 150, 152, 172, 175, 177, 177RG, 180,182, 206, 210, T206, T210, P210, 310, 320, 336, 337, P337,
401, 402, 411, 414, 421, 421B, 421C

Aerostar: 600 (PA-60-600), 601 (PA-60-601), 601P (PA-60-601P), 602P (PA-60-602P)

Mooney: M20(C, D, E, F, G), M20J (201), M20K (231)(232), M20M (TLS), M20R (OVATION)

Piper: PA24-180, 250, 260; PA28-140, 150; PA28-151, 161,180, 181, 235; PA28-200R, 201T, 236, 236T, PA 30

Rockwell: 112-114, 112TC-114TC

PURPOSE

The purpose of this notification is to advise all aircraft owners, operators, maintenance organizations, manufacturers, and parts distributors regarding aircraft seals produced without benefit of a Federal Aviation Administration (FAA) production approval.

BACKGROUND

Information received during a FAA suspected unapproved parts investigation revealed that since 1995, GEE-BEE, 16 Flying F Dr., Palm Springs, CA 92263, had produced silicone baffle seals and landing gear door seal kits for installation on type-certificated aircraft. GEE-BEE does not hold any FAA production approval to produce the seals.

RECOMMENDATION

Regulations require that type-certificated products conform to their type design. Aircraft owners, operators, maintenance organizations, manufactures, and parts distributors should inspect their aircraft, aircraft records, and/or aircraft parts inventory for the above-referenced seals and kits. If any of the referenced seals are installed on type-certificated aircraft, appropriate action should be taken. If any of the seals are found in existing parts inventory, it is recommended that the seals or kits be quarantined to prevent installation until a determination can be made regarding each part's eligibility for installation.

FURTHER INFORMATION

Further information 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 action taken to remove the parts from service.

This notice originated from the Los Angeles MIDO, 3960 Paramount Blvd., Lakewood, CA 90712-4137, telephone (562) 627-5385; and was published through the FAA Suspected Unapproved Parts Program Office, AVR-20, telephone (703) 661-0581, fax (703) 661-0113.

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UNAPPROVED PARTS NOTIFICATION



SUSPECTED UNAPPROVED PARTS PROGRAM OFFICE, AVR-20
45005 AVIATION DRIVE, SUITE 214
DULLES, VA 20166-7541

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

No. 2000-135
September 29, 2000

UPNs are posted on the internet at <http://www.faa.gov/avr/sups.htm>

Published by: FAA, AFS-610, P.O. Box 26460, Oklahoma City, OK 73125

AFFECTED AIRCRAFT

Gulfstream Aerospace G-159, British Aerospace HS 748, Fokker F27, Mitsubishi Heavy Industries YS-11, General Dynamics (Convair), and Vickers-Armstrongs Viscount.

PURPOSE

This Unapproved Parts Notification advises or provides information to all aircraft owners or operators, manufacturers, maintenance organizations, and parts distributors regarding propeller low-torque switches that have been approved for return to service but are not in compliance with Airworthiness Directive (AD) 98-04-13.

BACKGROUND

Information received during a Federal Aviation Administration (FAA) Suspected Unapproved Parts investigation indicated that, between 1997 and 1999, Gross Instrument Corp., 125-12 Liberty Ave., Richmond Hill, NY 11419, overhauled and approved for return to service 13 propeller low-torque switches that were not in compliance with AD 98-04-13. The AD, which incorporates Rolls Royce Service Bulletin No. Da61-12, Revision 2, dated September 1978, requires the removal from service of certain propeller low-torque switches. (See AD 98-04-13 and Rolls Royce Service Bulletin No. Da61-12 for specific instructions.) Information received indicates that two of the 13 switches have been removed from service. Listed below are the part and serial numbers of the switches that have not been located:

RECOMMENDATION

No person may operate a product to which an airworthiness directive applies except in accordance with the requirements of that airworthiness directive. Aircraft owners, operators, manufacturers, maintenance organizations, and parts distributors should inspect their aircraft, aircraft records, and/or parts inventories for any of the above-referenced switches. Please take appropriate action if any referenced switch has been installed on an aircraft. If any existing inventory includes the switches, we recommend that you quarantine them to prevent their being installed before they are determined to be eligible for installation.

FURTHER INFORMATION

You can contact the FAA Flight Standards District Office (FSDO) shown below for additional information. The FAA would appreciate any information relating to the source of an above-referenced switch, the means used to identify the source of the switch, and the action taken to remove the switch from an aircraft or parts inventory.

This notice originated from the New York FSDO, 990 Stewart Ave., Garden City, NY 11530-4858, telephone (516) 228-8029, fax (516) 228-8827; and was published through the FAA Suspected Unapproved Parts Program Office, AVR-20, telephone (703) 661-0581, fax (703) 661-0113.

Part No.	Serial No.
L944769	S/19390
L944738	S/10337
	P136337
	S/3722
	S/10917
L944772	11234
	SP4729
	SP14102
	RO5839
	16878
	P/127696
	076
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UNAPPROVED PARTS NOTIFICATION



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

SUSPECTED UNAPPROVED PARTS PROGRAM OFFICE, AVR-20
45005 AVIATION DRIVE, SUITE 214
DULLES, VA 20166-7541

No. 97-00029
October 10, 2000

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AFFECTED PARTS

Pratt & Whitney JT3D and JT8D Engines

PURPOSE

This Unapproved Parts Notification advises all aircraft owners, operators, manufacturers, maintenance entities, and parts distributors regarding improper repairs performed on JT3D and JT8D aircraft engines, engine parts, and associated gearbox assemblies.

BACKGROUND

An October 1996 Federal Aviation Administration (FAA) inspection revealed that A.O.G. Enterprise, Inc. (A.O.G.), 8049 NW 66th Street, Miami, FL 33166, performed improper overhauls, repairs, and modifications. The inspection revealed certain work performed by A.O.G. was outside their repair station ratings and performed without use of current data, qualified personnel, and required equipment. A.O.G. previously held Air Agency Certificate No. OGJR766L.

A subsequent FAA suspected unapproved parts investigation (which included an original equipment manufacturer's shop tear-down and analysis of engines overhauled by A.O.G.) revealed the following areas of concern:

- (a) **Antigalling compound** improperly applied to compressor disks and blades without use of current data.
- (b) **Engine bearings** returned to service without proper cleaning and inspection.
- (c) **Combustion chambers** not properly inspected by non-destructive testing.

RECOMMENDATION

Regulations require that type-certificated products conform to their type design and be properly maintained using current data, required equipment, and appropriately trained personnel. Aircraft owners, operators, manufacturers, maintenance entities, and parts distributors should inspect their aircraft and/or parts inventory for any engines or parts overhauled or approved for return to service by A.O.G. You should take appropriate action if any of these parts have been installed in an engine. If any existing inventory includes these parts, the FAA recommends that you quarantine the parts to prevent installation in aircraft until a determination can be made regarding each part's eligibility for installation.

FURTHER INFORMATION

Further information may be obtained from the FAA Flight Standards District Office (FSDO) shown below. The FAA would appreciate any information regarding the discovery of the above-referenced unapproved parts from any source, the means used to identify the source, and the action taken to remove them from inventory or service. Also, the FAA would appreciate information concerning premature engine failures attributed to the above-referenced repairs or overhauls.

This notice originated from the Miami FSDO, 8600 NW 36th Street, Suite 201, Miami, FL 33166, telephone (305) 716-3400, fax (305) 716-3456; and was published through the FAA Suspected Unapproved Parts Program Office, AVR-20, telephone (703) 661-0581, fax (703) 661-0113.

Issues of the Update Report Are Now Online!

Are you reading a borrowed copy of the Update Report? Subscriptions to the Update Report are now FREE to persons in the aviation industry or the government. To receive your free subscription, send your name, title, company, address, phone number, fax number and email address to ASA. Our email address is info@airlinesuppliers.com and our fax number is (202) 730-0274.

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 about one month after they are published. Complete sets of volumes six and seven are now on-line, as well as the first several issues of this Volume.

UPCOMING EVENTS

** = Schweitzer, Lewis or Dickstein will be speaking there*

- Nov. 5-7** **Regional & Corp. Aviation Industry Suppliers Conference**, Rancho Mirage, CA. Call (310) 203-9603.
Nov. 6 *** ASA Workshop**, Wyndham Garden Hotel, Newark, NJ. Call (202) 730-0270 details!
Nov. 9 *** ASA Workshop**, British Airways, London, UK. Call (202) 720-0270 details!
Nov. 29-30 **European Regional Airline Conference**, Barcelona, Spain. Call Carol Everest at (44) 1892 515364.
Dec. 13-14 **Heavy Maintenance, Upgrades & Conversions**, Dublin, Ireland. Fax for info. to: (44) 171 931 7186.

Need more information on identifying airworthy parts and "unapproved" parts?

Attend one of ASA's Continuing Education Workshops!

Each class is a full day seminar addressing a variety of subjects from basic aviation law for parts distributors to advanced topics like SUPs, hazmat, and some of the newest laws and policies affecting the industry.

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Nov. 9.....British Airways, London, UK.

\$50 for attendees at the Newark Workshop

\$80 for attendees at the London Workshop

This is "must-have" training for anyone distributing parts in the aviation industry.

Call ASA at (202) 730-0270 for registration forms and other details!

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Facsimile: (202) 730-0274

October 2000