Manufacturing Distributors Distributors Maintenance Operations Distributors

The Update Report

The Airline Suppliers Association

Volume 7, Issue 9 September 1999

REGULATORY UPDATE

FAA Cuts-Off 8130-3 Forms

Many customers ask for the 8130-3 airworthiness approval form. Sometimes they do it because it represents an element of their own receiving inspection system. Sometimes they do it because an FAA inspector has told them to do it. Whatever the reason, when the customer demands the form, we need to provide it.

The FAA has just issued a memorandum that generally prohibits DARs from issuing 8130-3 forms for parts held in a distributor's inventory.

ASA has always supported the paradigm of traceability. Through documentation, it is possible to trace a part back to a prior finding of airworthiness by a certificated source (like an air carrier, repair station or manufacturer) or by the FAA. This prior finding supports the subsequent customer's own regulatory obligations to assure airworthiness.

The preferred document for traceability among many customers is the 8130-3 airworthiness approval tag. This form bears the advantage of assuring a part's airworthiness when signed on the left side by the FAA or an FAA designee. Many customers are now asking for this form. In fact, sometimes, FAA inspectors in the field insist that no one can install a parts unless the part was accompanied by an airworthiness approval tag.

The problem with this request is that few parts are issued the 8130-3 form at the time of manufacture. Instead, a distributor who purchases a part directly from a U.S. manufacturer might only get the manufacturer's packing slip. While the packing slip alone used to be considered acceptable documentation, FAA emphasis on airworthiness approval documentation has lead customers (both in the United States and abroad) to demand more.

This means that distributors may be required by the conditions of the marketplace to obtain 8130-3 forms. Until recently, it was possible to hire a maintenance DAR to issue a recurrent airworthiness approval (8130-3 form) for a demonstrably airworthy part that was manufactured under a United States production approval. This permitted distributors to obtain the acceptable documentation demanded by some customers.

Some FAA offices felt there was something unnamable that was wrong with this practice. Often, the objection focused on the notion that the DAR was not physically at the production approval holder's facility. Sometimes detractors would note that the DAR does not have access to the manufacturer's drawings. This argument fails to support itself when you realize that the FAA's manufacturing

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Inside this Issue:

Congratulations to:

Air Parts International Sales, Inc.
Burbank, CA

Air Shunt Instruments, Inc.
Moorpark, CA

AOP Supply Corporation
Houston, TX

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

River City Avionics, Inc.
Memphis, TN

for their accreditation to the Airline Suppliers Association's Accreditation Program.

Keep monitoring,
http://www.airlinesuppliers.com
for a growing list of
FAA accredited distributors;
and see page 94 for a list of distributors who were reaccredited to ASA-100 this month.

ASA AIRLINE SUPPLIERS ASSOCIATION

A Message from ASA's President

By the way the offices at the FAA work together, one would think that they are separated by miles and miles.

In fact, the only things separating the key FAA offices that affect our industry are a hallway and a philosophy.

The FAA Division that wrote the memorandum restricting the methods for obtaining domestic 8130-3s from maintenance DARs, AIR-200, is directly across the hall from the division that oversees maintenance DARs, AFS-300, the Continuous Airworthiness Maintenance Division. ASA called our AFS-300 contacts to discuss the impact of the memo, only to find out that they were not consulted about it.

Anyone who has been to any industry meeting over the past few years knows that the FAA has strongly endorsed and promoted the use of the form. Flight Standards and the SUPs Program Office have promoted the form to deal with suspected unapproved parts, documentation, traceability and receiving inspection systems. AIR-200 originally provided function codes allowing for domestic 8130-3 issuance by maintenance DARs. FAA offices in the US and abroad regularly tell air carriers and repair stations that they must have an 8130-3 with all parts received into inventory.

The FAA asked industry to help in standardizing documentation and we have done our best. ARAC, the industry negotiated rulemaking body, has submitted a proposal to the FAA that would require an 8130-3 with every new part. Several domestic air carriers require 8130-3s with all parts.

I guess the big question is why is the FAA changing their policy, especially a policy that they have gone to great lengths to publicize? If someone at the FAA knows they are not speaking. During our most recent visit with the FAA, we were told that due to budget constraints the FAA is looking for ways to cut costs. However, when asked how much money or man-hours will be saved we were not told.

For years the FAA and Congress stated that a standardized form on all parts would greatly improve safety. Since industry responded to the FAA call for standardization of forms the least the FAA could do is explain why they are obstructing standardization.

If you are told that a customer requires an 8130-3 in order to receive a part, find out why. If it is because they were following FAA suggestions or requirements, immediately notify the contacts on page 100.

Best Regards

Michele Schweitzer

The Update Report
is a monthly newsletter of the Airline Suppliers Association. Questions/ comments should be addressed to the Editor:

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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
For information on special package rates for advertising, contact the Association at (202) 730-0270. Subscription cost is $120.00 US per year.

FAA Makes "PMA Pending" a Thing of the Past

The FAA plans to end the program that permitted some parts manufacturers to ship their parts before receiving production approval from the FAA. Distributors will need to update their receiving inspection systems with respect to parts that should be covered by Parts Manufacturer Approvals (PMAs) and Technical Standard Order Authorizations (TSOAs).

History

For many years, the FAA failed to enforce the rule that requires a parts manufacturer to obtain FAA-approval before manufacturing replacement or modification parts for sale for use on aircraft [the PMA rule]. Under this rule, a subcontractor to a production certificate (PC) holder (like Boeing or Pratt & Whitney) is permitted to sell parts to the PC holder but is not permitted to sell replacement parts into the aftermarket without first obtaining either a direct ship authority from the PC holder or a production approval from the FAA.

End-users realized that they could buy parts of equal quality from the PC holders' subcontractors without going through the PC holders. In some cases, the PC holders actively encouraged this procedure, because it released the PC holder from the obligation to stock and sell the parts.

The problem with this procedure was that it violated the FAA regulations.

As long as the FAA failed to enforce the regulations, though, the industry found that direct purchase from reputable subcontractors worked reasonably well. The FAA began to address itself more actively to enforcement of the PMA rule in the late eighties, but found itself losing enforcement cases. As the term "Suspected Unapproved Parts" became a popular buzzword in Congress in the early nineties, the FAA developed a plan to bring the industry into compliance through a cooperative effort rather than through enforcement action.

In 1995, the FAA published the Enhanced Enforcement Program [EEP]. The EEP offered existing manufacturers who did not hold FAA production approval an opportunity to continue shipping their parts if there was a reason to believe that they were airworthy (such as an existing relationship with the PC holder). Participants were required to apply by May 30, 1995. They were required to zealously pursue FAA approval for their parts. They were required to include a document with every shipment that explained the status of the parts in the program [commonly known in the industry as the "PMA Pending" Notification].

The FAA pledged to commit resources to processing the PMA applications. The FAA also announced that when the program was complete, these same resources would be focused on 'enhanced enforcement' of the PMA rule.

The FAA received thousands of PMA applications under this program. Over the past four and a half years, the industry has continued to accept parts bearing PMA Pending Notifications under the assumption that these companies would eventually receive PMAs. During this same time period, the FAA has issued many PMAs and TSOAs.

The FAA has also issued guidance designed to help close out categories of parts in the EEP. The FAA has issued TSOs for fasteners, bearings and seals, as well as a policy interpretation explaining what is meant by the term "standard parts."

Closing Out the EEP

On August 21, 1998, the FAA issued Policy Memorandum 98-10, announcing a deadline for EEP applicants handling standard parts, fasteners, bearings and seals. The Policy Memorandum required all applicants to submit a plan of action that would be complete by the October 30, 1999 deadline. The FAA intended that this deadline represent the last day on which any company without a production approval would be permitted to produce parts for under the EEP.

Complete Closure of the EEP

Conversations with the FAA indicate that the October 30, 1999 deadline will be extended to all applications currently under the EEP system. This means that all parts manufacturers will once again be subject to enforcement under the PMA rule after October 30. There will be no FAA permission to produce parts subject to FAA jurisdiction in the absence of a FAA production approval.

About six months ago, ASA spoke with several FAA Headquarters personnel who claimed that there is no central office maintaining records on the EEP. Central records are supposed to be kept by a flight standards office in Oklahoma City, but Oklahoma City claims to have forwarded the records to Headquarters about a year and a half ago, so it is impossible to know precisely how many EEP participants do not yet have FAA production approval; but there are industry indicators that suggest that the number may be substantial.

PC holders like Boeing may support the PMA application process by issuing technical assistance letters to PMA applicants indicating that the

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ASA Moves, Hires Staff, Elects QA Officers

The Airline Suppliers Association has moved! ASA is now located at 1707 H Street, NW, Suite 701, Washington, DC 20006. The new phone number for the Association is (202) 730-0270 and the new fax number is (202) 730-0274.

With the new facility, ASA has also added new staff. ASA's newest employee is Jason Lewis. Lewis comes to ASA from M & M Aircraft Services, where he was the Training Coordinator. Lewis will be handling training and accreditation issues for ASA. Be sure to specify which Jason you are seeking when you call, now that ASA has two Jasons (Jason Lewis and Jason Dickstein, ASA's General Counsel).

The Quality Assurance Committee met at ASA's Annual Conference, and will meet again in November. The Quality Assurance Committee is made up of ASA member companies. The Committee discusses the ASA-100 standard and develops improvements for ASA Board consideration. The Committee also addresses other industry quality issues, like development of training materials.

The Quality Assurance Committee is currently working on a variety of projects, including development of hazardous materials training materials, analysis of 'best practices' for parting out aircraft, and continued analysis of the Fastener Quality Act.

The most recent news from the Quality Assurance Committee is that the Committee's voting members have elected their Chair and Vice Chair for the next four meetings. The Chair is Larry Collings of Time Aviation and the Vice Chair is Jay Rosenberg of the International Airline Support Group. Collings and Rosenberg have both been active participants in the Committee's work, and will do a great job leading the Committee.

All Association members are welcome at Committee meetings, but a member must attend two out of the prior three meetings to be eligible to vote at a Committee meeting. Information on the Quality Assurance Committee is now available on ASA's web site.

Congratulations to:

Aero Industrial Sales Company
Rosendale, NY

Airline Spares America, Inc.
Deerfield, FL

Austin Aerotech, Inc.
Auston, TX

General Transworld Corporation
Torrance, CA

International Airline Support Group
Ft. Lauderdale, FL

Intertrade, Limited
Cedar Rapids, IA

Spectrum Aerospace, Inc.
Tempe, AZ

Unical Aviation, Inc.
Baldwin Park, CA

for their reaccreditation to the Airline Suppliers Association's Accreditation Program.

ASA
AIRLINE SUPPLIERS ASSOCIATION

Bad Bolts!

The FAA has released an information bulletin that warns of a manufacturing quality escape concerning D-head bolts.

Approved Quality Manufacturing (AQM) is a PMA holder located in Sandy, Utah. AQM manufactures a Nickel-Cadmium plated low alloy steel bolt; part number 772568QQ. These Combustor Chamber Outer Case bolts may be found installed on Pratt & Whitney JT8D-1 through 17AR and JT8D-200 series engines. This part is used in place of the Pratt & Whitney part number 772568 bolt.

An error occurred during Nickel-Cadmium plating performed by one of AQM's subcontractors. This caused two lots of bolts to be substandard. AQM's non-conforming lot numbers, 30246 and 30248, represent 24,375 non-conforming bolts.

The non-conforming lots were shipped to customers between September 1998 and June 1999. Shipping records indicate that some of the suspect lots were shipped to the following known facilities:

United Airlines	Received	3,513
Delta Airlines	Received	6,001
TWA	Received	4,300
Iberia	Received	200
M&M Aircraft	Received	6,750
AeroThrust	Received	3,600

The FAA has received at least six reports of bolts from this lot failing due to Cadmium Liquid Metal Embrittlement. The FAA has recommended that companies remove from inventories non-conforming bolts with part number 772568QQ that were manufactured under AQM's lot numbers 30246 and 30248.

The FAA information on this subject is available through ASA's web site.

DOT OIG Continues to Indict for Bad Parts

The July August issue of The Update Report included a graph labeled "Unapproved Part Cases Tracked by DOT OIG." Although the accompanying article described the data as only representing those cases that lead to convictions, the graph did not.

In the graph, the number of indictments in recent years appears to diminish radically. In fact, this represents cases that have been concluded with convictions, but it does not represent cases that are still in the judicial system. A true graph, available in the future when all convictions for this time period are available, would no doubt seem to indicate that indictments are not diminishing steadily as the graph seemed to suggest.

In fact, the Federal Government continues to indict and convict people and companies for trafficking in bad parts.

Problem Parts At A Glance

Combustor Chamber Outer Case bolts

Manufactured by Approved Quality Manufacturing (AQM) under PMA

Part # 772568QQ

Lot #s 30246 and 30248

A PMA bolt used in place of Pratt and Whitney part # 772568

P.A. International, Inc. and its President, Michael B. Paquet were indicted this summer under accusations of filing false certificates of conformance for helicopter parts. If convicted, Paquet faces up to five years' imprisonment on each count and fines totaling $2 million. The corporation faces criminal fines of up to $4 million.

The president of a Pennsylvania electronics firm was sentenced to 6 months' incarceration and fined $2,000 following his guilty plea in connection with the sale of adulterated aviation electrical connectors. Emil Stern, 56, of Southampton and his company, Secom Electronics Corp. of Burlington, NJ entered guilty pleas to mail fraud charges in March. Stern must serve 3 months at a Federal community corrections facility and 3 months in home confinement. In the June 10 sentencing, Stern also was placed on 5 years' probation; his company must pay a $32,000 fine and was placed on a year's probation. Stern and Secom also paid civil restitution of $55,000.

An aircraft-parts importer was sentenced June 17 in Chicago for the theft and attempted resale of substandard aircraft parts taken from two aircraft destroyed during the Gulf War. Robert Mansfield, owner of Navaero, Inc., was sentenced to 1 year and 3 months' imprisonment, a $7,370 fine and 3 years' supervised release.

FAA Establishes a Definition of "Critical Parts" … For Rotorcraft

"Critical parts." We hear the term every day in our business. Customers ask for special processing of critical parts; but how do you distinguish them from other parts?

Until recently, there was no definition of the term in the aviation regulations, despite the fact that the term is used throughout the regulations (particularly in the airworthiness standards that describe the minimum standards applicable to all aircraft).

The closest thing the industry had to a definition in the regulations was a statement in the part marking rules that all parts with life-limits, inspection intervals or other hard times specified in the aircraft's airworthiness limitations had to be marked with a part number and serial number. This section is entitled "Identification of critical components," leading the public to believe that all parts with hard times are, in fact, critical parts.

FAA has issued a definition of the term "critical part." The definition is limited only to rotorcraft parts; however the published definition may be applied to other aircraft in a colloquial sense, and further revisions to the fixed wing rules may incorporate this definition for all aircraft in the future.

According to the new regulation, a "critical part" is a part, "the failure of which could have a catastrophic effect upon the rotorcraft, and for which critical characteristics have been identified which must be controlled to ensure the required level of integrity." Designers of new rotorcraft will be required to develop a "critical parts list," which makes it clear which parts on a rotorcraft are critical.

The new regulatory definition is similar to some other definitions found in the FAA's guidance materials, like the "priority parts" definition found in FAA Order 8120.2. One of the advantages to a regulatory definition is that it cannot be changed upon a whim, nor without notice to the public.

Inventory Planning Note

Boeing is working with Russia's Ilyushin design bureau on designs for converting the Boeing 767 passenger jet to a cargo configuration.

PMA Rules Will Be Enforced

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proposed design meets the engineering requirements established by the PC holder for its product. The FAA often relies on these 'tech assist' letters in the application analysis. Boeing's Peter Gallimore indicates that Boeing has been steadily reviewing a backlog of tech assist letter requests since the beginning of the EEP, but that there are still many more applications for tech assist letters that need to be reviewed. Obviously, these as-yet unreviewed applications for tech assist letters represent a portion of the EEP program that may not meet the October 30 deadline.

There are also PMA applications in the system that are still awaiting FAA disposition - a disposition that may not be issued before October 30, 1999. Reasonably, the FAA will have to find ways to make necessary parts available to the end-users, or there will be a hew-and-cry from air carriers with AOGs. FAA Headquarters says these issues will have to be settles on a case-by-case basis. Field offices will be given discretion to handle matters within their jurisdiction, so we should expect inconsistent decisions.

Protect Your Business

The EEP was started through a formal notice in the Federal Register, but the FAA has issued no public notice about the end of this program. This provides a potential for a great deal of confusion in the industry.

Distributors need to prepare their receiving inspection teams for the termination of the EEP. Many distributors accept replacement and modification parts for which no PMA has yet been issued if it bears the correct documentation to indicate that the manufacturer participates in the EEP [see 7 The Update Report 37 (April 1999) for a description].

As of October 31, 1999, receiving inspectors must look carefully at the date on which the EEP part was produced. Parts produced after October 30 will not be covered under the EEP, and if there is no FAA production approval, or PC holder direct ship authority, then the part may be described by the FAA as "an unapproved part." Because of the concern over "unapproved parts," you may find it difficult to sell such parts to your customers in some cases.

Don't forget, there is nothing illegal about buying a part that was not manufactured under a FAA production approval. As long as the true nature of the part is disclosed to the buyer, there is nothing illegal about selling it. An installer may even install such a part if the installer can demonstrate that the part returns the product to an airworthy condition; however it is generally illegal to manufacture and sell an aircraft part without FAA approval.

Parts produced under the EEP before October 31 (assuming they are accompanied by the appropriate documentation) are acceptable parts and will continue to be acceptable parts after the EEP deadline. There is no need for distributors or air carriers to purge these parts from their inventories.

Spread the word to your manufacturer business partners! The EEP ends before Halloween, and after that the FAA insists that it will once again "be in an enforcement posture on the PMA rule." It will then become especially important for manufacturers to obtain the correct FAA approvals before producing replacement or modification aviation parts for sale.

FAA Withdraws Part 66 Mechanic Rule

The FAA has withdrawn the proposed changes to the certification and training requirements for mechanics and repairmen.

The proposal would have moved the regulations directly affecting mechanics and repairmen out of Part 65 and into a separate Part 66. The proposal had been drafted by the Aviation Rulemaking Advisory Committee; however the draft was returned to the FAA with significant dissent among the ARAC members.

In fact, the ARAC group could not agree on the way the Part 66 rule should regulate mechanics. Under the principles of negotiated rulemaking, where there is significant disagreement, the agency is supposed to remove the project from the rulemaking committee and return it to standard rulemaking procedures.

The project was returned to the FAA but the FAA did not resolve the significant problems that the ARAC participants had already recognized.

The FAA published the notice of proposed rulemaking on July 9, 1998 (63 Fed. Reg. 37172) and discovered for itself that the significant dissent was not limited to the ARAC volunteers who had argued about the draft. During the comment period for the NPRM, more than 1,500 members of the aviation industry submitted comments. The majority of the comments received opposed the proposal. In light of this opposition, the FAA has decided to withdraw the NPRM in its entirety for further internal study.

The rescission can be found at 64 Federal Register 42809 (August 5, 1999).

DARs No Longer Issue 8130-3s for Parts Held by Distributors

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designees do not generally refer back to the manufacturer's drawings each time they issue an 8130-3 form; instead they generally rely on the FAA-approved system to function in the correct manner (approved manufacturing systems include tests and inspections to assure the airworthiness of parts and products released to service). Further, the applicant for the form bears the burden to prove that the part is airworthy, so if unavailable manufacturers drawings were necessary to the DAR's analysis of the part, then the DAR would simply not issue an 8130-3.

FAA Fails to Support FAA Policy

ASA met with the FAA in the Spring to discuss the fact that some FAA personnel were still opposing the written policies that permitted DARs to issue 8130-3 airworthiness approval forms for demonstrably airworthy parts manufactured under an FAA production approval. ASA explained that use of this voluntary form was promoting safety by providing the end-users with airworthiness assurance. The FAA pledged to respond to the industry on this matter at a later date. At ASA's Annual Conference, the FAA began to speak of private memos that opposed the use of the 8130-3 form as a general traceability document. ASA members were understandably outraged.

While they could not describe a reasonable objection to the issuance of 8130-3 forms for airworthy parts already in the domestic market, the 8130-3 form's opponents in the FAA nonetheless knew they did not like the practice. So they issued a policy memorandum to FAA employees stating that FAA designees are no longer permitted to issue a form 8130-3 for identification of airworthiness approval status when the part is currently held by a "broker/distributor."

Safety and Commercial Problems

This raises an enormous series of problems in both the safety and commercial arenas. There is a safety problem because this inhibits the flow of information about airworthiness. This in turn creates a human factors problem because it encourages the use of multiple forms instead of a single standard form, which increases the possibility of a human factors-related mistake in identifying key information on one of these forms.

This represents a failure by FAA leadership to set a consistent policy, and distributors are the victims!

There is also a basic 'good government' problem with FAA's failure to set a uniform policy. The FAA has been actively supporting the notion of traceability as a way to combat parts-related problems, and many FAA personnel have supported the traceability paradigm by telling the end-users that they must ask for an 8130-3 form (even though there is no law that specifies this). The decision to stop issuing 8130-3 forms undercuts this paradigm of traceability by making it impossible to acquire the documentation that the FAA has been promoting. This represents a failure by FAA leadership to set a consistent policy. It raises the question, "Does the FAA support industry efforts to use traceability as a tool to support the installer's airworthiness analysis?" The answer may be that some offices in the FAA support traceability while others are working at cross-purposes to this airworthiness paradigm.

Finally, there is a commercial problem associated with the halt in 8130-3 forms. The customers are still requesting the forms. In some cases, use of the 8130-3 form has been written into the customer's manual. In many cases, FAA field inspectors are still insisting that customers ask for the 8130-3 form, and the FAA has done nothing to stop their employees from insisting that the 8130-3 is a requirement. Distributors who cannot meet their customers' requirements will not be able to sell parts, regardless of whether it is a legal requirement or a commercial one.

By prohibiting DARs from issuing 8130-3 forms for parts held in a distributor's inventory, the FAA has fired a shot across the bow of the entire industry. They have clearly demonstrated the internal conflicts that lie within the walls of FAA Headquarters. While various FAA offices promote voluntary traceability efforts (causing them to become *de facto* requirements through commercial practices), one FAA office, the Production and Airworthiness Certification Division, is acting to undercut one of the foundations upon which traceability in our industry is based.

ASA Responds

The Airline Suppliers Association will not sit idly by while internal FAA conflicts of vision whipsaw the industry into chaos. ASA has already issued a letter explaining the dangers of this new policy, and calling for a return to the practice of DAR-issued 8130-3s. The letter provides greater detail than is available in this article, and a copy of it is available on ASA's website. ASA has met with a variety of FAA officials on this subject. Now we need your help, as well.

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Need Traceability Documentation? Tell the FAA!

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A Call to Action

Everyone in the industry should write to the FAA about this situation. Explain that the availability of the 8130-3 form through qualified DARs has promoted safety in the industry, and the new prohibition will diminish safety while at the same time adversely affecting commerce.

Describe your experiences with the 8130-3 form. Explain which customers are requiring the form. Explain how the form has supported safety by providing both traceability and airworthiness assurance. Explain how difficult it has been to acquire the form. If you or a customer have been told by an FAA employee that the 8130-3 form is a requirement, please describe the circumstances in your letter. If you have lost a sale because your customer insisted on an 8130-3 that was unavailable, then describe this story in your letter.

In your letter, remind the FAA that this form has been a benefit to the industry even though it is a voluntary form. Ask for this voluntary form to be made available to distributors once again through maintenance DARs.

Send the original of your letter to Frank Paskiewicz, who is responsible for the memo halting the issuance of 8130-3 forms. Send a copy of your letter to Tom McSweeney, who is responsible for coordinating a uniform FAA policy, and send another copy to ASA for our files.

Original to:
Frank Paskiewicz, Manager
Production and Airworthiness Cert.
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591
Fax: (202) 267-5580

Copy #1 to:

Thomas McSweeny
Associate Administrator for Regulation and Certification
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591
Fax: (202) 267-9675

Copy #2 to:

Jason Dickstein
Airline Suppliers Association
1707 H Street, NW, Suite 701
Washington, DC 20006
Fax (202) 730-0720

Everyone in the industry should write to the FAA … tell the FAA why the 8130-3 is important to the industry even though it is a voluntary form, and how availability of the form through DARs supports both safety and business practices….

Other Sources of 8130-3 Forms

There are still domestic customers who will insist that the parts they buy must bear an 8130-3 airworthiness approval tag, so traceability through the form remains important even if the FAA is losing interest in supporting issuance of the form. There are still a few options for acquiring the form to meet the desires of customers.

Repair stations and other maintenance providers are still permitted to use the 8130-3 form for recording the approval for return to service following maintenance. This means that a repair station could perform an inspection to confirm the airworthiness of the part in question. In such a case, the repair station should have written parameters for how the inspection is conducted, which are referenced or repeated in block 13 of the form. Block 12 (status/work) should read as "inspected" because that is the scope of work that was actually performed.

The FAA has published one program for inspecting new, unused parts and issuing an 8130-3 form in its order 8130.21B. The program is available to repair stations, air carrier and air operators. The company's quality system must include the following:

(a) part must be traceable to an FAA-approved source of manufacture of new products/parts;

(b) system must monitor the current status of the product/part with respect to shelf life, compliance with airworthiness directives'

(c) must perform a functional test and/or inspection to determine continued conformity and airworthiness; previous records generated under an FAA regulatory scheme may be used as part of the airworthiness analysis;

(d) the 8130-3 must be completed as an approval for return to service in compliance with applicable regulations, and the remarks section must clearly state the process used to determine airworthiness, including references to any other publications or documents used. If the part was removed from a new type certificated product, then the product should be identified by type and serial number.

Of course, manufacturers with FAA designees on staff may issue 8130-3 forms for new parts, and distributors should obtain this documentation from the manufacturer whenever it is available.

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Find Source Documents on the Internet

Interested in one of the subjects addressed in this issue? Want to find out more? The source documents underlying many of the articles in this issue are available on the internet. Just set your browser for http://www.airlinesuppliers.com/7tur.html#9. This address features an index to the articles which will bring you to the original documents on the world wide web just by clicking on the description.

UPCOMING EVENTS

**** = ASA will be speaking there***

Oct. 12-14	**NBAA 52nd Annual Meeting & Convention**, Atlanta, GA. Fax for details: (202) 862-5552.
Oct. 17-20	**CASE**, Ft. Lauderdale, FL. See their website at http://www.caseinc.org/news.htm for details.
Oct. 24-26	**Association of European Airlines**, Glasgow, Scotland. Call (32) 2 640-3175 for details.
Oct. 24-26	**Speednews Regional & Corporate Suppliers Conference**, Rancho Mirage, CA. Call (310) 203-9603.
Nov. 4-5	**SPEC 2000 Forum**, Hyatt Westshore, Tampa, FL. For details call (202) 626-4039 or check out their website at http://www.spec2000.com. Don't forget to check out the SPEC 2000 ad on page 101!
Nov. 15-18	*** NDIA DoD Maintenance Symposium**, St. Louis, MO. Call LMI for information at (703) 522-1820.
Dec. 7-9	**Aircraft Heavy Maintenance Conference,** The Forum Hotel, UK. Call (44) 171 931 7072 for information.
	Coming up in the year 2000:
Jan. 24-26	**HELI EXPO 2000**, Las Vegas Convention Center, NV. Send a fax to (703) 683-0341 for more details.
Mar. 21-22	**Speednews Aviation Industry Suppliers Conference**, Los Angeles, CA. Call (310) 203-9603.
April 17-19	**MRO 2000**, Opryland Hotel Convention Center, Nashville, TN. Fax for details: (212) 904-3334.
May 1-3	**RAA 2000 Annual Convention**, San Antonio, TX. Send a fax to (202) 429-5112 for details.
May 7-9	**ATA Engineering, Maintenance & Material Forum**, Phoenix, AZ. Call (202) 626-4000 for details.
May 7-11	**Aircraft Electronics Ass'n Convention & Trade Show**, Reno, NV. Call (816) 373-6565 for details.
June 25-27	**** Airline Suppliers Association**, Las Vegas, NV. See our web site at http://www.airlinesuppliers.com. More details will be available soon. Call us at (202) 730-0270 to make sure you are on the mailing list.

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