



The Update Report

The Airline Suppliers Association

Volume 7, Issue 12

December 1999

UNDERSTANDING THE REGULATIONS

Manufacturing Regs and Distributors

ASA was recently asked a question by a distributor that works closely with several United States manufacturing companies. The manufacturer had recently obtained PMA on an aviation part. The same company also made similar parts for use with ground support equipment.

The question concerned the separation between the aviation and non-aviation quality systems, and the extent to which this production quality system had to be extended through the quality procedures of the distributor. The first part of this article briefly discusses the distinctions that should be made in a manufacturing environment, and the second part of this article addresses the distribution questions.

Separating Aviation and Non-Aviation Fabrication Systems

This article was prompted by an ASA member's query. It seems that one of the manufacturers with whom the distributor worked was wondering whether the aviation regulations required it to do anything special because it made non-aviation parts in the same facility as the one in which aviation parts were made.

Every FAA production approval requires a quality system that imposes certain minimal controls on the production process. Such controls in-

clude recordkeeping requirements. For this reason, there will be specific requirements for any manufacturer's production quality system associated with the aviation parts manufactured under a FAA Parts Manufacturer Approval (PMA).

A PMA manufacturer is required to show that each article manufactured under the production approval conforms to an FAA approved design (the design component of the PMA). Obviously, the manufacturer will need to have some way to separate PMA parts from those that do not meet the design requirements of the PMA; but this should not necessarily imply that non-aviation parts do not meet the same engineering requirements as the PMA parts.

When a manufacturer produces both aviation and non-aviation parts, this does not always require separate production lines. It is possible for the manufacturer to produce non-PMA parts to the same design parameters as those produced under a PMA. From an engineering standpoint, the only difference between the PMA parts and the non-PMA parts would be the markings on the parts – the production line may be split at the part-marking phase, with lots being chosen for PMA marking or other marking depending on their intended final market. In some facilities that manu-

(Continued on page 134)

Inside this Issue:

ASA 2000 Training Workshop	129
ASA Staff Changes	130
PMA Marking of EEP Parts	131
Fuel Pump SUPs Notice	132

Congratulations to:

Best Prices in Parts, Inc.
Miami, FL

Grahmann International Contracting
San Antonio, TX

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

Aviation Sales Distribution Co.
Miami, FL

For their re-accreditation to the Airline Suppliers Association's Accreditation Program

Keep monitoring,
<http://www.airlinesuppliers.com>
for a growing list of
FAA accredited distributors.



A Message from ASA's President

The end of the year brings to a conclusion our 3-½ year long auditing relationship with Quality Management Solutions LP (QMS LP). Tom Willis, Denis Kalscheur, Roy Resto, Allyson Cate, Phyl Ostenburg and QMS LP's associate auditors have always been a professional group of people. Their attention to detail, commitment and hard work helped to establish the ASA-100 Audit Program and to ensure that the Program maintained the highest level of quality standards.

ASA has developed a new audit structure that will increase the quality of the audits, better standardize the audits, and monitor the effective of ASA-100. Jason Lewis will devote his attention to the Accreditation Program.

As the industry changes so does ASA. Over the past few years ASA has seen growth in membership, in attendance at the annual conferences and workshops, and Accreditation Program enrollment. But members have said that they want more member services. They have asked ASA to develop in-house training programs, to increase the focus on non-quality control training areas, to increase representation with foreign governments, to increase contact with local FAA offices and FAA headquarters, and to increase lobbying efforts on Capitol Hill.

It is difficult for any organization to do everything and to please everyone, but ASA is refocusing its energies to concentrate on the issues that are most important to the members. We want to focus on the issues that would best help the members' businesses to grow and prosper.

During the November Board of Directors meeting in Chicago, our

focus was on restructuring ASA's staff and activities to better serve the desires and needs of the membership. Page 130 details some of the staffing changes; I am particularly proud of these changes, because they should assure that ASA is properly supported by competent professional staff for the foreseeable future.

We know that a safe industry is good for business. If you think that we are not addressing the issues that affect your business, then please contact me or any member of the Board. We are here to serve your interests.

On behalf of Jason Dickstein, Jason Lewis, Debbie Kammers, Jeanne Pearsall, and myself it has been a pleasure working with you this year. Best wishes to you and your family for a happy and healthy millennium.

Best Regards

Michele Schweitzer

Board Of Directors:	
Karen Borgnes	253-395-9535 Pacific Aero Tech, Inc.
John Butler	818-768-7000 Time Aviation Services, Inc.
Amy Cochis	860-565-2712 Pratt & Whitney SML
Bill Cote	561-998-9330 The AGES Group
Fred Gaunt	310-829-4345 Pacific Air Industries
Paula Sparks	954-431-2359 AVTEAM
Mike Molli	847-836-3100 Scandinavian Airlines System
Officers:	
Karen Borgnes	253-395-9535 Corporate Treasurer
Jason Dickstein	202-730-0270 Corporate Secretary
Michele Schweitzer	202-730-0270 President

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

Jason Dickstein
Airline Suppliers Association
1707 H Street, NW, Suite 701
Washington, DC 20006
voice: (202) 730-0272
fax: (202) 730-0274
email:

Jason@WashingtonAviation.Com

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.

Copyright © 1993 - 2000, The Airline Suppliers Association. All rights reserved.

Airline Suppliers Association

Continuing Education Series

ASA 2000 Training Workshop

_____ January 20
Seattle, WA
Wyndham Garden Hotel, SeaTac
(206) 244-6666

_____ March 29
Chicago, IL
Hosted by AirLiance Materials
Contact ASA for location information

_____ September 26
Miami, FL
Embassy Suites Hotel
(305) 634-5000

_____ January 25
Los Angeles, CA
Doubletree Westwood
(310) 475-8711

_____ May 4
Tempe, AZ
Sumner Suites
(480) 804-9544

_____ September 28
Atlanta, GA
Location to be announced
Contact ASA for location information

_____ March 27
Dallas, TX
Hosted by Dallas Aerospace
Contact ASA for location information

_____ September 25
Ft. Lauderdale, FL
Riverside Hotel
(954) 467-0671

_____ November 6
Newark, NJ
Location to be announced
Contact ASA for location information

*New this year: A European Location!
November 9 – Heathrow or Gatwick,
England
Location to be announced*

How do you register?

1. Download the ASA Workshop Registration form from the internet at <http://www.airlinesuppliers.com>
2. Complete the form.
3. Read and sign the attestation box at the bottom of the page.
4. Fax the form to ASA at (202) 730-0274 to reserve your spaces in the Workshop of your choice.
5. Mail a check for the registration fee to ASA.

Registration fee is \$50 per person. The fee includes all workshop materials, morning and afternoon snack breaks, lunch and a certificate of participation. Workshops will run from 8:30 am – 4:30 pm.

Syllabus for Each Location

08:30-10:00	<u>Aviation Law 101</u> : Introduction to the Aviation Regulation System and the Parts Approval Process.
10:30-12:00	<u>Traceability and Quality</u> : Helping to Make the <i>Next</i> Sale through Adequate Parts Documentation and Quality Systems.
13:00-14:30	<u>Hazmats, and OSHA and Torts, Oh My</u> : Avoiding Hazards in the Parts Distribution Workplace.
15:00-16:30	<u>Hot Issues</u> : The Late-Breaking News and the Hot Issues that are Hitting the Industry.

Changes at ASA

ASA has taken steps to increase the services it offers to the ASA members.

Just two short years ago, ASA was staffed by just two people: President Michele Schweitzer, and Jason Dickstein.

Now they have been joined by Jeanne Pearsall, Jason Lewis, and Debbie Kammers, each of whom will play an important role in the services that ASA delivers to the industry.

Membership Questions

Jeanne Pearsall is the new ASA Membership and Meetings Coordinator. In this role, she will plan ASA meetings like the Workshops and the Annual Conference. She will answer membership-related questions and will be in charge of developing new membership benefits. She will also handle marketing for the Association.

ASA-100 Questions

Jason Lewis was hired in September as the Accreditation Manager. Lewis holds an Airframe & Powerplant Mechanic's Certificate. He has an exten-

sive background in quality systems and training. As the Accreditation Manager, he is the first point of contact to answer any ASA-100 related question.

New Auditors

ASA has also hired a full-time auditor: Debbie Kammers. Kammers has significant air-carrier experience and is well respected in the CASE community.

Early in 2000, ASA will formalize arrangements with several other part-time auditors and firms to supplement the work done by Kammers.

Dickstein Opens a Law Firm

ASA General Counsel Jason Dickstein is pleased to announce that he will open his own law firm on January 1, 2000. The law firm will concentrate on representing aviation-industry companies and aviation-industry trade associations.

Although this is a big change for Dickstein, it should be a fairly minor change for most ASA members. Dickstein will continue to represent

ASA before the government. He will continue to lobby for regulations that promote safety and free commerce among aircraft parts distributors. He will also continue to deliver the ASA Continuing Education Workshops.

Dickstein will maintain an office in the same building as ASA, so he'll be available to answer questions for the Association. He will continue to answer questions about the regulations and about the industry for ASA members; and of course he will continue to write the Update Report each month.

The new relationship will help to assure that Dickstein continues to represent ASA for many years to come.

The only difference will arise where ASA members find that they need legal help that the Association just cannot provide. In these cases, the Law Offices of Jason Dickstein will be ready to provide your company with the support it needs to resolve tricky situations in a manner calculated to support the business needs of the company, as well as the legal needs. Dickstein plans to offer a significant fee discount to ASA members as an additional membership benefit.

When You Have Critical Needs In Overhaul & Repair, Aero Technology Has All The Solutions.

The professional care Aero Technology offers you in service and technology is unmatched in the avionics industry. Our rapid response rate to your critical needs from a highly experienced staff makes us tops in the repair and maintenance field.

Call us now for more details.

- Convenient SITA/SPEC 2000 Order & Repair Administration (LGBGHXD)
- Airworthiness approvals from JAA, CAAC, DGAC, DGCA, FAA
- Sales and Service Center for: Bendix/King, British Aerospace, Canadian Marconi, Collins/Rockwell Int., Gables, Lockheed Martin, Loral/Fairchild, Sperry/Honeywell, Sundstrand, Teledyne.



aero technology

FAA Repair Station DQ3R458L

Phone (562) 595-6055 Fax (562) 595-8416
3333 East Spring Street, Long Beach, CA 90806 USA

PMA Marking of "PMA-Pending" Parts *Not Permitted*

In the September issue of The Update Report, ASA reported on the FAA decision to end the Enhanced Enforcement Program (EEP) [*FAA Makes "PMA-Pending" a Thing of the Past*, 7 THE UPDATE REPORT 93 (September 1999)]. The EEP, also known as the "PMA-Pending" program, permitted manufacturers to continue to produce certain parts for sale to the aviation industry despite the fact that the manufacturer did not possess a FAA production approval for the part. The FAA ended the EEP, requiring EEP participants to have a plan that includes discontinuance of production by October 30, 1999.

Now that the EEP is complete, two questions have arisen in the industry. The first question is whether EEP parts for which no PMA was issued, may be installed on aircraft despite the lack of subsequent 'validating' FAA approval. The second is whether EEP parts that are identical to PMA parts may be marked as if they had been produced under the PMA.

Are EEP Parts Still 'Good' Parts?

Where a company applied for a PMA under the EEP, and the PMA was granted, it is easy to draw the conclusion that the parts manufactured during the EEP period continue to be airworthy. The subsequent issuance of design and production approval in the PMA letter represents a validation of the airworthiness of the EEP parts.

Where no PMA was ever issued for a variety of parts, there is no subsequent validation of the design and production quality system. Because of this, some people in the industry have leapt to the conclusion that these EEP parts are somehow unacceptable. This is an incorrect conclusion.

In fact, all parts properly made in compliance with the EEP are considered to be acceptable for sale and/or installation. The FAA has always contended that the EEP represented an exercise of the FAA authority found in 14 C.F.R. 21.305(d). This rule permits the FAA to establish new methods for obtaining parts approval. The EEP represented an alternate method for obtaining approved parts. Parts production systems that were 'approved' through this process yielded 'approved parts,' and the parts do not lose this 'approved' status merely by virtue of the fact that the system by which they were produced no longer exists (the systems no longer exist because the EEP has been shut down).

In summary, parts that were validly produced under the EEP continue to be considered acceptable for sale and installation under FAA standards.

Marking EEP Parts

The fact that EEP parts are still 'good parts' raises a second issue. The aviation regulations require that PMA parts and TSOA parts be marked. People in the industry are used to seeing these markings on the replacement parts they consider to be 'good'

parts. Generally, EEP parts were not marked with identifying symbols comparable to those found on PMA and TSOA parts.

Some people in the industry have wondered whether it is allowable to mark an EEP part with PMA symbols if the manufacturer obtained PMA after completing the fabrication of the EEP part. The commercial value to such a mark is obvious: it provides the consumer with a readily-recognized symbology that the consumer associates with 'good' parts.

A part must be produced in accordance with the PMA or TSOA rules in order to be qualified to bear the PMA or TSOA mark. While EEP parts are considered to be 'approved' under the special provisions of 14 C.F.R. 21.305(d), they do not fit within the PMA/TSOA rules, so they are not eligible for PMA/TSOA markings.

Because EEP parts are not eligible for PMA markings even where a PMA was subsequently granted, it is generally not permissible for a manufacturer to mark EEP parts whose fabrication preceded issuance of a PMA as if they had been manufactured under a PMA.

(Continued on page 133)

Missed the 1999 ASA Annual Conference?
You don't have to miss out on the Annual Conference Binder!

Extra binders with copies of all 1999 distributed conference materials are available while supplies last... just send \$75 to:

*Airline Suppliers Association
1707 H Street, NW, Suite 701
Washington, DC 20006*

*Mark Your calendars: the 2000 ASA Conference is June 25-27!
More conference information can be found on the ASA website
<http://www.airlinesuppliers.com>*

FAA Discovers Inadequate Soldering on Fuel Pumps

Unapproved Parts Notifications are published by the FAA's Suspected Unapproved Parts Program Office. They are republished here as a service to our readers. The Association is not responsible for the claims made by the Notification. All questions on the Notification should be directed to the FAA contact office listed in the Notification.

UNAPPROVED PARTS NOTIFICATION

No. 99-098
November 1, 1999

AFFECTED AIRCRAFT: Large Transport Category

PURPOSE: The purpose of this notification is to advise all owners, operators, maintenance entities, and manufacturers of large transport category aircraft of improper repairs performed by third parties other than the manufacturer (Crane Hydro-Aire) that are found on fuel pumps used on Boeing and McDonnell Douglas aircraft, and to solicit information concerning such repairs. It is possible that these repairs may not be limited to fuel pumps used on Boeing and McDonnell Douglas aircraft or Crane Hydro-Aire fuel pumps.

BACKGROUND: During three Suspected Unapproved Parts investigations, it was discovered that repairs not approved by Hydro-Aire (i.e., soldering, wire splicing, low-grade sleeving) and non-OEM parts were installed in several Crane Hydro-Aire fuel pumps used on both Boeing and McDonnell Douglas aircraft. The soldering method employed in these repairs is not a reliable method and could cause arcing, thermal stress, and degradation of the electrical insulating capabilities of the sleeving. Such repairs could present a safety hazard.

RECOMMENDATION: Please review all available current and historical records concerning the repair or overhaul of large transport category aircraft fuel components (boost, override/jettison, scavenge, and other types of fuel pumps) for evidence of improper repairs or unapproved parts.

FURTHER INFORMATION: The Federal Aviation Administration (FAA) would appreciate any information available regarding this matter. Attached to this notification is a checklist that may be used to convey such information. Send all available information (manufacturer, part number, serial number, owner, aircraft make/model, maintenance provider, type of improper repair, name of suspected unapproved part, etc.) to: FAA, Eastern Region Hq, Flight Standards Division Office, Attention: Salvatore Scalone, AEA-230B, JFK Int'l. Airport, Fitzgerald Federal Building, Jamaica, NY 11430, telephone (718) 553-3249, fax (718) 995-5696.

A complete list of the Suspected Unapproved Parts Notices published by the FAA is available on the internet at <http://www.faa.gov/avr/upn.htm>

FAA Safety Checklist to Aid in the Transmission of Data Concerning for Fuel Pumps and other Large Transport Category Aircraft Fuel Components

SAFETY CHECKLIST

1. Do you maintain Crane Hydro-Aire Component Maintenance Manuals (CMM) in your technical library? ___yes ___no
2. Do you have Crane Hydro-Aire Service Information Letter (SIL) No. 60.703-2-12, issued March 1, 1999? ___yes ___no
3. Do you repair Crane Hydro-Aire fuel pumps within your facility? ___yes ___no
4. Do you use a repair station outside of your facility to repair the Crane Hydro-Aire fuel pumps for your utilization or resale? ___yes ___no
5. Have you evaluated your fleet of aircraft to determine if you utilize Crane Hydro-Aire fuel pumps in your fleet? ___yes ___no
6. Have you resold Crane Hydro-Aire fuel pumps to operators or parts distributors? ___yes ___no
7. Have you experienced failures of the Crane Hydro-Aire fuel pumps in your operation? ___yes ___no
8. Do you use another manufacturer's fuel pump in your fleet? ___yes ___no
9. Have you or your repair station vendor identified any improper repairs or unapproved parts in Crane Hydro-Aire fuel pumps? ___yes ___no

THE PARTS IN YOUR INVENTORY

Continue to Look for Documentation on EEP Parts

(Continued from page 131)

The FAA has recently issued a policy memorandum (AIR-200 Policy Memorandum 99-11) that makes it clear that EEP parts that were not manufactured in accordance with the PMA rules are ineligible for a PMA mark, even when the manufacturer subsequently obtains a PMA. This would not preclude the FAA from issuing a special exemption from the regulations to permit PMA marking of EEP parts, but this sort of exemption is quite unlikely.

Documentation Standards

Don't forget that most EEP manufacturers should still have copies on file of their EEP letters – the letters that the FAA issued to acknowledge participation in the EEP – and these letters continue to have value for the parts that were made under the EEP.

Some manufacturers and distributors will continue to have an inventory of EEP parts that were made before the October 30, 1999 EEP closure date.

In the absence of markings on EEP parts, distributors should be especially careful to obtain any available documentation supporting the allegation that the part was manufactured under the EEP. In most cases, production records or even shipping documents, coupled with a copy of the original EEP letter from the FAA, should provide sufficient traceability to support the conclusion that the part was manufactured under a system that approved by the FAA under 14 C.F.R. 21.305(d). This should be sufficient for most receiving inspection systems.

Distinguishing Good Ideas from Regulations

(Continued from page 127)

facture both civil aviation and military aviation parts, for example, this is a common practice.

There may be business reasons for a manufacturer to plan a system that separates parts created under a PMA from those created outside the scope of the PMA. The real decision should be a business decision that takes into account liability concerns, manufacturing efficiency, quality concerns, and customer needs.

In at least one case reported to ASA, an FAA representative told the manufacturing company that it was required to keep records of where all of the parts it manufactured were sent, to support the claim that certain parts were manufactured without the intent that they be installed on aircraft (and were therefore exempt from the FAA-PMA rules). This "requirement" is not supported by the regulations, even though it may have represented sound business advice for that particular company. Like all 'sound business advice' received from a United States Government representative, it is optional. The FAA does not have the power to require a company to keep records concerning non-aviation parts, and no regulation requires a PMA holder to maintain destination records on PMA parts – instead, the regulations require the PMA holder to maintain inspection records on completed PMA parts (must be kept for two years).

One reason that a distinction might be made between PMA and on-PMA parts is because the FAA aftermarket part rules only apply to parts manufactured *with the intent that they be installed on aircraft* (or on their component parts). In an enforcement action, the FAA would try to prove that certain parts were manufactured out-

side the scope of the PMA, but were still produced with the intent that they be sold for installation on an aircraft. Proving this is the FAA's burden in an enforcement action. If the manufacturer keeps part-by-part records detailing the intended installation of the part (aviation vs. non-aviation), then this could help the FAA prove its case if the manufacturer violated the PMA parts rules. This is one important reason that the FAA would want a company to maintain such records – it permits the FAA to hang the company with its own paperwork. On the other hand, these sort of records can help the manufacturer defend itself in an enforcement action if the PMA rules have not been violated (but the state of the PMA rules and guidance today make it difficult to be certain that one is not violating the manner in which an individual FAA inspector will interpret the regulation).

Affect on Distributors

The reason this became important to an ASA member is that the distributor was asked to do two things based on the FAA manufacturing inspector's requirement.

First, the FAA inspector required that the manufacturer's distributors disclose their customers, to double-check that the manufacturer's end-user expectations were being met. Just as there is no FAA regulation to require a manufacturer to keep records of end-users of parts, there is also no FAA regulation that requires a distributor to keep and disclose a list of its customers. If a distributor chooses to share this information with a manufacturer, then this should be a business decision based upon the needs of the manufacturer and distributor. This information would be a commercial document that should not ordinarily be available to the FAA inspector.

The second requirement communicated to the distributor was quite disturbing. This came from a different FAA inspector, through a different manufacturer in a similar situation. The manufacturer had obtained PMA on most of its parts but not on everything it manufactured. An FAA inspector apparently told the manufacturer that if it supplied parts without FAA production approval to a aviation parts distributor, then it must obtain a statement from the distributor that "the parts are being purchased for installation on an aircraft and is [sic] approved by the aircraft manufacturer."

There are serious problems with this situation. First, the manufacturer appears to be producing parts for sale for installation on an aircraft without benefit of a PMA or other exception to the PMA rules. This appears to represent a likely violation of the PMA rule, unless the manufacturer can demonstrate that it did not intend the parts to be sold for aviation use at the time they were manufactured (even though the FAA bears the burden to demonstrate intent, a wise manufacturer should be prepared to prove its own intent in its own defense).

Second, the distributor is being asked to produce a document that could be used in an enforcement action against the manufacturer, and that appears to have no other possible purpose. Distributors should be very cautious if asked to disclose, in writing, that the parts it is buying are intended for aviation use when the distributor knows that the parts are not manufactured under a PMA or one of the exceptions to the PMA rules. In some cases, the manufacturer may be violating the regulations, and the document is intended to be used by the

(Continued on page 135)

Beware of Conventional Wisdom Masquerading as a Regulation

(Continued from page 134)

FAA in an enforcement action. Even when no laws are broken, this sort of transaction may be labeled as a Suspected Unapproved Part (SUP) investigation, and rumors of a SUP investigation can harm a company's business.

The third problem with the statement requested is that it asks the distributor to attest to an approval by the production certificate (PC) holder (like Boeing or Pratt & Whitney). In most cases, this is not possible because the PC holder has not 'approved' the part. In fact, except when it is manufactured under a direct ship authority, there is generally no mechanism for a PC holder to approve manufacturing by a third-party manufacturer — only the FAA has the power to grant production approval to a United States manufacturer. In the cases where the parts manufacturer has been granted direct ship authority by the PC holder, the manufacturers should possess the necessary paperwork to document the transaction, and the distributor should ask the manufacturer for copies of the direct ship documentation.

Some distributors may feel that a part is approved by the PC holder if it is listed in the illustrated parts catalog (IPC). Do not fall into this trap, and do not use the IPC listing as the basis for a statement that a part is approved by the PC holder. Listing a part number in an IPC does not mean that the manufacturer of the part has production approval, and it does not mean that the manufacturer of the part has direct ship authority. It only means that the PC holder buys the part, inspects it within the context of its own quality system, and installs it when it meets the inspection requirements. Except in the most unusual cases, a distributor should not attest to the proposition that a PC holder has

granted any form of approval to another company's parts unless those parts have been run through the PC holder's own quality system (in which case they may be approved parts by virtue of the PC holder's own production approval).

Aviation parts distributors sometimes purchase parts that are manufactured outside of the scope of the PMA rules. One reason they do this is upon the request of an air carrier or other customer. The customer's engineering department may have made a determination that the part is acceptable for installation. Under these circumstances, there is nothing wrong with the distributor purchasing and reselling the non-PMA part. ASA recommends that the documentation accompanying the part clearly indicate its airworthiness status (or lack thereof), but even this is a recommendation, and not a regulatory requirement (it is required by the accreditation program but the program itself is voluntary).

Conclusion

Aviation parts distributors are being squeezed from both sides by the regulatory requirements imposed on their part sources (manufacturers) and by the requirements imposed on their customers (like air carriers and repair stations). It is important to understand the rules that actually apply to one's business partners, and equally important to be able to distinguish the propositions that are not regulatory, but that merely represent an individual's notion of good business. While the regulatory requirements must be supported, not all "good business ideas" represent good business; and each non-regulatory idea should be analyzed to determine the wisdom of its implementation. Conventional wisdom can change rapidly, and it is unfortunate but true that many people

confuse conventional wisdom with regulatory requirements.

When faced with a so-called regulatory requirement that appears particularly onerous, it is always wise to ask for the source of the requirement. Read the rule and see if there is a better way to approach compliance.

And don't be afraid to direct your questions to the Airline Suppliers Association. Your situation might be one that is shared by your peers in the industry — one that needs to be corrected across the industry for the good of aviation.



ASA
AIRLINE SUPPLIERS
ASSOCIATION

***Experience how ASA
can expand your
marketing horizons!***

Advertise in:
The Update Report

For more information contact:

Airline Suppliers Association
1707 H Street NW, Suite 701
Washington, DC 20006
Tel: (202) 730-0270
Fax: (202) 730-0274
e-mail: info@airlinesuppliers.com

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#12>. 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

Jan 20	* ASA Workshop , Wyndham Garden Hotel, SeaTac, Seattle, WA - A full day of aviation law and quality practices meant for distributor employees/owners. Just \$50 for ASA Members! See Page 117 for details!
Jan. 24-26	HELI EXPO 2000 , Las Vegas Convention Center, NV. Send a fax to (703) 683-0341 for more details.
Jan. 25	* ASA Workshop , Doubletree Westwood, Los Angeles, CA. See Page 129 for details!
Feb. 8-10	Aero-Engine Cost Management Conference , San Francisco, CA. Call (44) 171 931 7072.
Feb. 22-27	Asian Aerospace 2000 , Changi Exhibition Center, Singapore. Send a fax to (65) 3344632 for details.
Mar. 1-3	US Regional Conference & Valuation Workshop , Washington, DC. Call Caroll at (44) 1892 515364.
Mar. 7-8	FAA Aviation Forecast Conference , Washington, DC. Call FAA at (202) 267-9943 for details.
Mar. 21-22	Speednews Aviation Industry Suppliers Conference , Los Angeles, CA. Call (310) 203-9603.
Mar. 27	* ASA Workshop , Dallas, TX . <i>Sponsored by Dallas Aerospace</i> . See Page 129 for details!
Mar. 29	* ASA Workshop , Chicago, IL. <i>Sponsored by AirLiance Materials</i> . See Page 129 for details!
April 14-17	Symposium 2000: ARSA Annual Repair Symposium , Arlington, VA. Call (703) 739-9543.
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 4	* ASA Workshop , Sumner Suites, Tempe, AZ. See Page 129 for details!
May 7-9	ATA Engineering, Maintenance & Material Forum , Phoenix, AZ. Call (202) 626-4000 for details.
May 7-10	Aircraft Electronics Ass'n Convention & Trade Show , Reno, NV. Call (816) 373-6565 for details.
May 9-11	* PAMA/NATA Aviation Services & Suppliers Supershow , Tampa, FL. Call (202) 730-0260
June 25-27	** Airline Suppliers Association , Las Vegas, NV. More details available soon. See our website at http://www.airlinesuppliers.com . Call us at (202) 730-0270 to make sure you are on the mailing list.

Airline Suppliers Association
1707 H Street, NW, Suite 701
Washington, DC 20006
Telephone: (202) 730-0270
Facsimile: (202) 730-0274

December 1999