



# The Update Report

The Airline Suppliers Association

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## REGULATORY UPDATE

### FAA Publishes Draft Mil Parts Guidance

FSCAP. It sounds like a noise made by a cartoon character, but it is actually an acronym for Flight Safety Critical Aircraft Parts. At the ASA Annual Conference, Al Michaels promised that the FAA would soon release an advisory circular (AC) on the subject. That draft FSCAP AC is now published. Temporarily known as AC 20-XX, the document has been made available for public comment in order to ask the public to help make this a better advisory circular.

The term "FSCAP " is generally applied to military surplus parts that have critical characteristics. A part with critical characteristics is one whose failure in flight could cause catastrophic failure in an aircraft or engine. The FSCAP AC is therefore meant to address military surplus aircraft parts that are used in the civilian market, and whose misuse could lead to a catastrophic failure.

When the Department of Defense sells military surplus items, it makes no representation as to the part's eligibility for installation on a civil aircraft. Before installing such a part on an aircraft, the installer must ensure that the part will meet the applicable airworthiness standards.

There are a variety of problems associated with this analysis: military surplus parts may not meet FAA type design;

even if they do meet type design requirements, they may have been operated outside of the limitations imposed by the Federal Aviation Regulations.

The FSCAP AC provides guidance for evaluating U.S. military surplus flight safety critical aircraft parts and determining their eligibility for installation on U.S. type certificated products. It helps the installer to make the required determinations concerning the airworthiness and installation eligibility of a military surplus part.

The AC is not yet in its final form. Those interested in commenting on the proposal should submit their comments to Federal Aviation Administration, Continuous Airworthiness Maintenance Division, AFS-300, 800 Independence Avenue, SW, Washington, DC 20591, attention: Al Michaels. All comments will be reviewed and those with appropriate merit will be considered for inclusion in, or amendment of, the AC. Comments are due by February 5, 1999.

A copy of the AC is included with this month's issue of The Update Report for each ASA member. Other persons may obtain a copy of the AC from the internet - copies will be available through the ASA web site.

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## A Message from ASA's President

1998 has been an exciting year for ASA. We've published some exciting information, and our staff has spoken at a wide variety of conferences about the industry. We have seen growth among the membership and also in the accreditation program.

Although 1998 has been a productive year for ASA, many of the government projects that are important to distributors were not completed this year. The FAA is not the only culprit in this claim. Congress addressed many different aviation issues but was able to close out the debate on very few of them.

Even though we continuously asking when these documents are expected to be released, a cynical person could argue that sometimes it is best to leave the industry alone. However, there is something about the end of the century that has everyone thinking big change.

Congress has dubbed 1999 the *Year of Aviation*. There are many projects that Congress has shown interest in: Foreign Repair Station Safety Act, Part-Marking of Life Limited Parts, and Suspected Unapproved Parts, to name a few. In 1999 the FAA is expected to continue working on many issues: a rewrite of the Part 21 manufacturing regulations, a rewrite of the Part 145 repair station regulations, an AC on dispositioning Undocumented Parts (*PAAT Phase III*), an AC on Receiving Inspection (Al Michaels and Ken Reilly offered a preview at the ASA Conference), an updated revision of AC 00-56, definitions for commercial and standard parts, and the list goes on.

The FAA has recently filled several of their key executive management positions that had been vacant. With a

new management team in place, industry may finally see the release of many of the long awaited documents.

The government isn't alone in try to accomplish huge, industry changing tasks before the end of the century. ATA has begun to re-write SPEC 106. Obviously any changes, major or minor, to a document that is so widely used in the industry will affect everyone.

It has never been ASA's style to look for a fight, but we do enjoy a challenge and 1999 looks interesting. On behalf of Jason and myself, I wish you and your family a happy holiday and a healthy New Year.

Best regards,

Michele Schweitzer

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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 202-216-9140. Subscription cost is \$120.00 US per year.

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## Air Carrier Responsibility for Vendor Audits

An air carrier representative recently asked ASA whether air carriers are responsible for auditing suppliers who provide the carrier with repaired parts. The crux of the problem was whether the air carrier should treat suppliers of repaired parts as distributors, or as maintenance providers.

As with many queries in our industry, there is a simple answer that can satisfy the lawyers and the inspectors, but that answer fails to tell the whole story. Underlying that simple answer is a more complex answer that may lead you to a different result.

The regulations require an air carrier to oversee the work accomplished by maintenance performers, but they do not require auditing of parts suppliers. There is no regulatory requirement to audit a supplier of parts, even if that supplier is providing parts that were maintained by a third party. This is the simple explanation of the regulatory answer. The more complex answer, though, is that an air carrier's auditing responsibilities serve more than just regulatory obligations, and consequently there are additional, non-regulatory concerns that must be addressed in any question concerning supplier audits.

### *The Regulatory Answer*

An air carrier's auditing responsibility may be tracked to the air carrier's ultimate 121 subpart L responsibility for all maintenance performed on the aircraft. Federal Aviation Rule section 121.363 states that an air carrier remains primarily responsible for all maintenance performed on its aircraft, products, and parts. Federal Aviation Rule section 121.365 requires the air carrier to be responsible for assuring that the maintenance provider has an adequate organization for performing

maintenance and required inspection items. Federal Aviation Rule section 121.367 places on the air carrier the burden of assuring that the maintenance provider follows the air carrier's manual, and also places on the air carrier responsibility for assuring that the maintenance is done right.

The air carrier must use some means to assure that companies that perform maintenance for the air carrier perform it properly. The most common mechanism is to perform audits of the parties that provide maintenance to the air carrier. By engaging in an auditing program, the air carrier fulfills its regulatory obligation to oversee the work performed by its maintenance contractors.

The installation of a part is a maintenance activity. As such, the installer is responsible for assuring that the work is performed in a manner that assures that the final product will be airworthy (with respect to the work done). When an air carrier purchases a part, the air carrier is responsible for assuring the airworthiness of the part prior to installation. This is an activity that is performed in-house, by the air carrier itself. The determination may be based in part upon airworthiness documentation associated with the part, like an 8130-3 form, but the final analysis is performed by the air carrier personnel as an element of their regulatory obligations.

An air carrier cannot reasonably be responsible for all maintenance that occurs in the world. It is only reasonable to make an air carrier responsible for the maintenance that it performs, or that it causes to be performed.

When an air carrier purchases a part from a supplier, the supplier is not performing a maintenance activity for

the air carrier. Instead, the sale is a commercial transaction. Assume that the part was maintained in the past, but not at the request of the air carrier. At the time the maintenance is performed, it is not known which person will eventually purchase the part for installation on an aircraft. It is not reasonable to require an air carrier to be responsible for this maintenance. Indeed, every air carrier would have to be responsible for the maintenance because any air carrier could potentially purchase the part!

Because the maintenance in question was performed before the sale of the part was contemplated, the air carrier is not responsible for that maintenance (although the carrier is responsible for the ultimate airworthiness of the aircraft on which the part is installed). Further, an air carrier bears no regulatory responsibility for the actions of the parts supplier (again, the responsibility is only for the airworthiness of the part).

### *The Answer Behind the Answer*

The regulatory answer says that there is no obligation for an air carrier to audit its suppliers – even if those suppliers are providing repaired parts. Despite the fact that there is no regulatory obligation to do so, though, air carriers generally perform audits of their major parts suppliers. This is because our industry's professional responsibilities, commercial obligations and moral initiatives generally exceed the regulatory standards set by the FAA. In short, our industry tends to aim higher than the minimum standards.

Although there is regulation requiring it, air carriers frequently make demands upon their parts suppliers to

*(Continued on page 126)*

## Airworthiness Directive: Parker Hannifin Airborne Dry Air

Although Airworthiness Directives (ADs) apply against aircraft owner / operators and not against those who hold inventory, most distributors like to track ADs in order to provide a value-added service to the customers that need to comply with the ADs. Most ADs are issued against products (aircraft, engines, and propellers); however, some ADs are issued against parts. Because of the way ADs are catalogued, ADs that are issued against parts (as opposed to products) may be overlooked.

The FAA has recently issued an AD against parts. The FAA is proposing actions to be taken against Parker Hannifin Airborne dry air pumps, conversion kits, and coupling kits, utilizing part number (P/N) B1-19-1 flexible coupling that is marked with a date of manufacture reading either "12/97" or "5-6/98."

The affected dry air pumps are installed as original equipment on many airplanes, particularly Cessna, Raytheon, Piper, and Mooney airplanes. They are the primary vacuum source on small single-engine airplanes and the secondary vacuum

source on larger twin-engine airplanes, so their failure could affect altitudinal and directional instruments. The substandard flexible coupling was shipped from Parker Hannifin between January 1, 1998, and October 13, 1998, so parts that were installed or modified prior to January 1, 1998, would not incorporate the affected coupling.

This AD requires replacement of the affected part with P/N B1-7-3 flexible coupling (part of Parker Hannifin flexible coupling kit, Airborne P/N 350). Although a distributor is not required to comply with the AD before selling a Parker Hannifin Airborne part, AD compliance can affect the value of the part. Remember, installation of a part is maintenance, so this replacement should be performed by a properly qualified repair station or other maintenance provider.

In emergency situation, the FAA is permitted to issue ADs as final rules without prior notice and comment. This does not absolve the FAA of its responsibility to make rulemaking open to public participation. Under these circumstances, where an AD is

issued without prior notice and comment, the public is permitted to comment on the AD after it has been issued and the FAA is required to review these comments and react appropriately. Persons interested in commenting on the proposed rule should submit their comments in triplicate to the FAA, Central Region, Office of the Regional Counsel, Attention: Rules Docket 98-CE-108-AD, Room 1558, 601 E. 12th Street, Kansas City, Missouri 64106. The comment deadline is January 5, 1999. The full text of this AD is available through ASA's website.

The August issue of The Update Report reminded members with an interest in the Part 66 rule (mechanics and repairmen) to send comments to the FAA before the deadline. That deadline is approaching quickly! The comment period ends on Jan. 8, 1999.

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## ATA Ponders Packing Sheet Proposal

The Air Transport Association (ATA) will soon announce that it has developed a sample packing sheet for use by the air carriers and the companies that sell parts to them.

ATA is the Washington, DC trade association that represents many of the largest air carriers. ATA publishes SPEC 106, a set of guidelines for identifying acceptable sources of aircraft parts.

SPEC 106 provides guidance to air carriers on inspection and documentation of parts and parts suppliers. A

significant portion of this specification is devoted to recommendations for quality system elements that ATA members feel a supplier ought to have in place. SPEC 106 is meant to be used in conjunction with an air carrier's procurement, auditing, and incoming inspection systems.

An ATA Committee has recently approved a new standard packing sheet, which ATA plans to publish in the next revision of SPEC 106. The SPEC 106 packing sheet would be a purely commercial document: it would not take the place of regulatory approvals

like the 8130-3. It is anticipated that some air carriers could ask their suppliers to provide an ATA 106 material certification form, an ATA packing sheet, and an 8130-3.

A miniature copy of the packing sheet is reproduced below. This miniature version is too small to make out the details clearly, so a full-sized version is included (with instructions) in this month's Update Report 'package' for ASA members. Non-members will be able to obtain a copy of this document from ATA when it is published in the revision to SPEC 106.

### PACKING SHEET

Page x of x

**Supplier Information**

Master Carton Number	Hazmat	Packing Sheet Number	Country of Origin	Date
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Sold To:	Ship To:	Forward To:
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**Miscellaneous**

Customer Order Number	Customer Item Number	Shipped Part Number	Part Serial Number	Description	Shipment Quantity	Unit of Measure	Unit Price Amount	Extended Value	Remarks
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	
	Mfr. Date	Harmonized Tariff Code	ESDS	Ordered Part Number	Shipment	Auth.	Country of Mfr.	Batch/Lot Number	

SAMPLE

## Air Carrier Oversight Strategies Include Audits

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assure the air carrier that the parts it receives are high quality. An air carrier may ask the supplier to attest to certain information, it may ask the supplier to submit to an air carrier audit, or it may ask the supplier to submit to a third party audit.

### Requests for Information

One tool that a buyer may use to help assure the quality of the parts it receives is to request written guarantees of the part's condition and other qualities. Advisory Circular (AC) 20-62D recommends that used parts subject to certain unusual circumstances be appropriately identified. Based on the AC guidance, some buyers explicitly ask that the seller attest to one or more of conditions in the seller's documentation accompanying the used parts. Some of these conditions that may be addressed are:

- (1) the part was not removed from an aircraft without a US airworthiness certificate; or
- (2) the part was not obtained from an aircraft subject to extreme stress, sudden stoppage, heat, major failure or accident.

Buyers may also ask for additional information, depending on the buyer's particular concerns. It is important for suppliers to recognize that some information requests are impossible to fulfill. For example, some buyers asks the seller to guarantee that a part was not subject to extreme heat, extreme stress, nor installed on an aircraft that was in an accident. If the supplier does not have complete information on the history of the part, then it is impossible for the supplier to honestly attest to the part's history.

It is also important to note that some buyers request information that may no longer be relevant. Some buyers insist that the supplier guarantee that the part has not been installed on an aircraft subject to an accident. If the "accident-related" part was subsequently overhauled and subject to hidden damage inspections, then the fact that it was installed on an "accident related" aircraft may no longer be a safety concern. In such a case, a history of the part is more useful than a false statement attesting that the part has never been installed on an aircraft subject to an accident.

Another popular area of inquiry is Y2K compliance. Some buyers are asking for guarantees that a part is Y2K compliant. Some of the manu-

*A number of air carriers have begun asking their parts suppliers to become accredited to AC 00-56.*

facturers (like AlliedSignal and Sunstrand) have begun supporting their customers demands for Y2K compliance information but other have not yet joined this effort. Where there is no support from the manufacturer for developing Y2K compliance information, it may be impossible for the supplier to certify Y2K compliance.

Obviously, rigid documentation requirements can cause unnecessary commercial problems if they are drafted too narrowly; yet documentation requirements that are not rigid can lead to interpretation problems as business partners use varying language that can avoid the true intent of the certification request. Rather than rely-

ing on documentation and guarantees alone to assure quality, many air carriers audit their major suppliers to assure that the supplier has a quality system in place that is sufficient to address the buyer's quality concerns.

### Air Carrier and Third Party Audits

Many air carriers want their business partners to possess robust quality systems designed to assure that parts are safe and properly identified. There are two ways to review a company's quality system. The first is through audits and questionnaires sent by the end user itself (like an air carrier or a repair station). The second is to rely on audits performed by another party that the end user trusts.

Many times an air carrier cannot audit all of its suppliers. To do so would require more man-hours than that air carrier has available among the quality auditors. By relying on audits performed by others, the air carrier is able to leverage its limited resources.

The Coordinating Agency for Supplier Evaluation (CASE) is an example of a program that permits air carriers to share auditing responsibilities. The Air Carrier Section of CASE examines the pool of maintenance and alteration service providers for its members and divides the auditing duties among the members. Each member accepts assignments to share the auditing load. The results of the audits are only available to the CASE members. Each members of CASE trusts that the others will objectively audit their assignments to the CASE standard, and that the auditors will reject any company that does not meet this standard. This audit allocation practice eliminates redundancy, since many of the air carriers would have looked for the same

(Continued on page 127)

## Third Party Audits Can Resolve Air Carrier Concerns

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elements.

CASE is not presently allocating audits for distributors. Air carriers may choose to audit their distributors to the CASE standard but these audits are done voluntarily and do not count against the air carrier's allocation (so they represent additional work). This means that only distributors with repair stations or with especially close air carrier relationships are likely to receive CASE audits. Even among distributors who do receive audits, they may find that they are not listed in the CASE registry. CASE has changed its policy on listing distributors, so there is no guarantee that a customer can rely on CASE audits to cover all of the available suppliers.

There are other parties on whom an air carrier may rely for auditing purposes. The FAA has developed a program called the Voluntary Industry Distributor Accreditation Program, which is described in Advisory Circular (AC) 00-56. AC 00-56 provides an opportunity for suppliers of parts to implement a quality system that is acceptable to the FAA. The AC uses the term "distributor" to describe any company that maintains an inventory of parts, so the next few paragraphs will use the term in the same way.

The AC 00-56 quality system exists in two parts. First, AC 00-56 requires a distributor to meet the requirements of a quality system that has been designated by the FAA. There are several such systems described in the AC, including ASA-100, ISO 9000, SAE 7103 and SAE 7104.

Second, the AC provides a framework for the additional elements of an acceptable distributor quality system. These elements may or may not be

found in the 'base' quality system, but they are important elements that the FAA feels ought to be part of every distributor's quality system. They address issues that are particular to the aviation industry like airworthiness documentation and issues that are important to the aviation industry like storage controls.

A number of air carriers have begun asking their parts suppliers to become accredited to AC 00-56. There are several features of this program that make it different from the CASE program, such as the fact that the system was published by the FAA, the fact that the FAA's Advisory Circular provides legal benefits to air carriers that use accredited suppliers (although comparable benefits may be offered to CASE participants at the discretion of the FAA), and the fact that any company may participate in the program (a supplier's participation is not subject to the decision of an air carrier, which can be based upon economic factors).

The AC 00-56 program relies on third party audits conducted at the expense of the distributor. The audits are done by reliable companies (ASA uses QM-SLP, a company that specializes in aviation quality; SAE uses its own NADCAP/PRI auditors; and ISO works through its registrars). AC 00-56 represents an economical means of achieving safety oversight of parts suppliers.

### Conclusion

Dave Lotterer of the Regional Airline Association in Washington, DC recently explained that there is a great deal of confusion in the industry about auditing parts suppliers. He suggested that it may boil down to a problem in distinguishing "the parts approval issue" from "the outsourcing issue."

The fact is an air carrier is required by regulation to be responsible for the work performed by a maintenance contractor like a repair station, but there is no rule that requires an air carrier to audit its parts suppliers. Nonetheless, effective oversight of both maintenance providers and parts suppliers is an important element to any air carrier's quality system.

Using techniques like documentation and auditing of suppliers, air carrier oversight of their business partners protects the air carrier's interests and also enhances aviation safety. Auditing in particular has been shown to be an effective means of confirming the robustness of the business partners' quality systems. It also helps bring quality professionals together to share ideas and improve the quality system.

Because of the resources required by an auditing program, some air carriers are unable to visit the facilities of their business partners as often as they would like. Some have found that reliance on the FAA's AC 00-56 program can help.

This article touches briefly on a wide variety of issues. ASA hopes to expand upon these issues and many more in the 1999 volume of The Update Report.

## ASA-100 Milestones

How do we know the accreditation program is over two years old? The first accredited companies are already getting their two year reaccreditation audits!

One condition of the AC 00-56 program is that accredited companies must pass reinspection, and acquire a new accreditation certificate, every two years.

Four companies recently passed reaccreditation audits to extend their accreditation by two years. Reaccreditation audits are conducted to the same standard as initial accreditation audits; however the audited company brings years of experience with ASA-100 to the table at the reaccreditation audit so the accredited distributors should find the reaccreditation process to be a bit easier than the initial accreditation process.

The reaccredited companies are:

**Avio-Diepen, Inc.** of Forest Park, GA  
**AVTEAM** of Miramar, FL  
**Aviosupport** of Kirkland, WA  
**International Aircraft Associates** of  
Miami, FL

ASA offers its congratulations to these companies for passing their ASA-100 reaccreditation audits.

A fifth company has also received an extension to its ASA-100 accreditation. **Willis Aeronautical Services, Inc.** of San Diego, CA moved its facility and was therefore required to have a fresh on-site audit of the new facility. ASA is pleased to announce that Willis also passed its reaccreditation audit.

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## FAA Names New High-Level Personnel

On November 23, the FAA announced that it had filled three important high-level posts.

William S. Davis (ACS-2)  
Deputy Associate Administrator  
for Civil Aviation Security

L. Nick Lacey (AFS-1)  
Director, Flight Standards Service

Elizabeth Erickson (AIR-1)  
Director, Aircraft Certification Service

"I am so pleased these talented aviation professionals have accepted these challenging positions that are so vital in carrying out the agency's new, more-focused aviation safety and security agenda," said FAA Administrator Jane Garvey. "The decades of combined aviation experience these talented individuals offer in the private sector, government and the military will go a long way in helping the agency enhance air safety, security and system efficiency for the 21st Century."

Davis will assist the Associate Administrator for Civil Aviation Security, Cathal L. Flynn, in planning, developing, directing and executing programs to implement the national aviation security strategy. Civil Aviation Security also directs the FAA's cooperation with foreign aviation authorities regarding aviation security worldwide.

Since 1997, Davis has been a transport pilot for the Federal Express Corp. There he gained experience in air cargo operations, including the shipment of hazardous materials. Prior to his work with Fed Ex, Davis served for 26 years with the U.S. Coast Guard.

Last month The Update Report announced that Thomas McSweeney had

been promoted to the position of Associate Administrator for Regulation and Certification. McSweeney took command of a bureaucracy that was missing some of its most important executives. Two of the most important positions are now filled: the directors of Flight Standards and Aircraft Certification.

As the new Director of the Flight Standards Service, Lacey will lead an organization of more than 4,500 safety inspectors and other aviation professionals. His main focus will be on setting safety standards for the aviation industry and overseeing regulatory compliance.

Flight Standards is responsible for all oversight of air carriers and repair stations. Programs that emanate from Flight Standards can have an effect on suppliers by changing the business practices of our customers. One of the programs under Lacey's authority is the Voluntary Industry Distributor Accreditation Program (AC 00-56), which accredits distributors that implement an acceptable quality system.

Since 1996, Lacey has been an aviation consultant, providing airline operators and others with advice on meeting federal safety regulations and improving services. From 1994 to 1996, he served as vice president-operations of Tower Air, Inc. From 1992 to 1994, he was program manager of the Civil Reserve Air Fleet. Lacey served from 1986 to 1992 in various military capacities. Lacey is no stranger to quality: during his military service he was Chief of the Department of Defense's Air Carrier Survey-Analysis Division, where he implemented a congressionally mandated program to establish safety and quality standards for airlines authorized to carry military personnel and cargo.

### Don't Forget!

ASA will publish the **1999 Membership Directory** shortly after the first of the year. Membership Directory Information Forms have been sent to all ASA members. Please fax any changes to ASA at (202) 216-9227. The deadline is December 17th! Also, please contact the Association if you are a member but you did not receive your information form.

Erickson is a familiar face at Aircraft Certification; she served as Tom McSweeney's deputy when he was Director and she has served as the Acting Director of Aircraft Certification since McSweeney's promotion. Her tenure with the FAA goes back to 1984, and before that she was a research psychologist at the U.S. Army Research Institute in Alexandria, VA.

As director of FAA's Aircraft Certification Service (ACS), Erickson will oversee a staff of 1,000 engineers, inspectors and other aviation professionals. She will be responsible for establishing standards for the design and production of aircraft and aeronautical products, as well as monitoring the continued safety of these products.

A wide variety of important projects belong to ACS. Policies for the 8130-3 form emanate from ACS. ACS is also responsible for the definition of standard parts that is currently being debated in the halls of the FAA. The entire notion of 'approval' of parts comes from ACS activities – approving designs and the fabrications inspection systems associated with those designs.

The appointments of Davis and Erickson are effective immediately; Lacey will join the agency in January.

## SFAR 36 Extended Five Years

The FAA has published a proposal that would extend the expiring provisions of Special Federal Aviation Regulation (SFAR) 36. SFAR 36 is a special limited FAA rule that provides qualified companies with certain FAA privileges concerning data associated with the completion of a major repair.

SFAR 36 is available to air carriers (Part 121), air operators (Part 135), and repair stations (Part 145). The SFAR 36 authorization permits a company to approve an aircraft product or article for return to service after accomplishing a major repair without the need for the company to hold data approved by the FAA. Instead, the company uses data it has developed itself.

The SFAR 36 company is allowed to complete a major repair using the data it has developed instead of approved data. To be permitted to do so, the company must have completed the necessary engineering analysis that would have supported FAA approval of the data.

Some people have commented that providing a company with the ability to approve the data, instead of designating a repair as "does not need approved data," would make more sense. The FAA did, however, have a purpose in adopting this unusual approach.

One reason for this approach to major repair data is that it precludes the sale of the approved data to other companies. This procedure permits the FAA to maintain greater control over the data because only the company with SFAR 36 authority is permitted to make use of the data (unless and until the FAA approves the data for use by other repair facilities).

This is not an expansion to the scope

of permissible work. Regardless of SFAR 36 authorization, for example, a repair station is still limited to performing only the work described in its certificate and capabilities list (if it has such a list). Thus, a repair station's class/rating serves as a natural limitation on the scope of repairs that may be authorized under SFAR 36.

Currently, more than 25 air carrier and domestic repair station certificate holders enjoy SFAR 36 authorization. These authorizations are scheduled to expire on January 23, 1999. The proposal would extend the regulatory authority for SFAR 36 so that it would not expire until January 23, 2004.

When it was promulgated in 1978, SFAR 36 was originally meant as an interim rule. The FAA recognized that some new mechanism for the approval of major repair data was necessary, and SFAR 36 was meant to serve until more comprehensive solutions could be found. During the upcoming five year extension period, the FAA is expected to replace the SFAR 36 provi-

sion with a more general provision for delegating FAA authority. The Aviation Rulemaking Advisory Committee (ARAC) has submitted to the FAA a recommendation for a uniform program for issuing and overseeing delegations like SFAR 36 [for more details see 6 The Update Report 115 (October 1998)].

Further information is available by contacting Carol Martineau, Policy and Procedures Branch, Aircraft Engineering Division, AIR-110, FAA, 800 Independence Ave., SW, Washington DC 20591. Her telephone number is (202) 267-9568. A very short comment period opened and closed in between issues of The Update Report. Although the comment period is now closed, late-filed comments are reviewed as long as it is reasonable to do so. Complete information on commenting to the FAA is available in the proposed rule, which can be accessed through ASA's web site.

### Around the Industry

The **RAF** is seeking bids from companies interested in meeting their requirements for the repair, overhaul and alteration of **Lockheed L-1011 TriStar** airframe components and associated repairable spares. The chosen contractor will work directly with OC Supply Wing, RAF Brize Norton (in the United Kingdom). The contract would not include components and spares directly related to the engines, APUs and air-to-air refueling equipment. Companies should fax a statement of interest to the RAF immediately. Full contact details are included in the RFP, which is reproduced on ASA's web site.

**Kellstrom Industries, Inc.** announced that it would acquire **Solair, Inc.** Both companies are active ASA members.

ASA Member **Turbine Solutions, Inc.** is the proud sponsor of a NASCAR race car.

Wright Brothers Day is Dec. 17th. It commemorates the **Wright Brothers'** successful flights in a heavier than air, mechanically propelled airplane, on Dec. 17, 1903, near Kitty Hawk, NC. Congress established this commemorative day (36 U.S.C. § 169).

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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/6tur.html#10>. 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*

**1999**

- |                    |   |
|--------------------|---|
| <b>First Qtr</b>   | <b>* ASA One-Day Workshops</b> , Coming to your home town soon! Watch for more details next month.  |
| <b>March 16-17</b> | <b>Speednews Aviation Industry Suppliers Conference</b> , Los Angeles, CA. Call (310) 203-9352.   |
| <b>April 6-8</b>   | <b>MRO '99</b> , Atlanta, GA. Call (212) 904-3334 for details.  |
| <b>April 14-15</b> | <b>Purchasing and Aviation Suppliers Conference</b> , Brussels, Belgium. Call 44 171 931 7072 for details.  |
| <b>April 18-20</b> | <b>CCMA</b> , Mexico (ASA should have more information after the first of the year).  |
| <b>April 20-22</b> | <b>* NATA/PAMA Aviation Services and Suppliers Supershow</b> , Phoenix, AZ. For more information, call Joanne Stahling of PAMA at (202) 216-2378. |
| <b>May 2-4</b>     | <b>ATA Engineering, Maintenance &amp; Material Forum</b> , Memphis, TN. Call (202) 626-4081.  |
| <b>May 10-12</b>   | <b>Regionl Aircraft Association Annual Convention</b> , Phoenix, AZ. Call (202) 419-5113.   |
| <b>July 18-20</b>  | <b>* ASA Annual Conference</b> , Marco Island, FL. More details will be available in future issues.   |

*\* events with asterisks will feature presentations by ASA personnel*

ASA Will Be Conducting Its Annual Workshops All Over the Country Early  
Next Year. Watch for More Details in the Next Issue of The Update Report

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