

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-007

EFFECTIVE DATE: January 1, 2005

TERMINATION DATE: December 31, 2005

ISSUE: What is a "certified true copy?"

AFFECTED SECTIONS: ASA-100 Revision 3.4 § 10 (E); Appendix A

BACKGROUND:

The ASA-100 quality system requires that an accredited distributor meet the requirements of both ASA-100 and the FAA Advisory Circular AC 00-56A (Voluntary Industry Distributor Accreditation Program).

ASA has created a tool called a letter of Interpretation (LI). LIs are used to provide guidance regarding ASA-100 and/or FAA AC 00-56A. LIs are required if applicable to your business. Each LI addresses requirements and future expectations.

The documentation matrix of AC 00-56 describes the documentation appropriate for accredited distributors. For shipments of new parts, products, and appliances that were received with regulatory airworthiness approval documents, that matrix requires that a distributor provide to the customer a certified true copy of the regulatory airworthiness approval document.

In addition to the requirements of the AC 00-56 documentation matrix, ASA-100 Revision 3.4 § 10(E) requires a distributor to have a procedure in place for accountability of duplicate documents, when copies of material certification documents used for redistribution shipments are made. This provision is supported by FAA AC 00-56A § 6(K).

An issue has arisen concerning interpretation of the term "certified true copy." Some state laws define this term to mean a notarized document. It was not the intention of the FAA nor industry at the time that AC 00-56 or AC 00-56A was drafted that a "certified true copy" be a notarized copy. The intention at the time of drafting was that the distributor would self-certify the correctness of the copy based on its own quality system.

ASA has coordinated this interpretation with the FAA. The FAA recognizes and acknowledges that the term "certified true copy" as used in FAA AC 00-56 reflects self-

certification by the distributor and does not require a notary signature.

To reduce confusion in the industry, this Letter of Interpretation (LI) provides interpretation of a term used in ASA-100. This definition applies only to ASA-100, and is not applicable to any other document.

INTERPRETATION:

The term "certified true copy," shall mean an accurate duplication of a document that is certified as such by the distributor. The distributor's certification need not be formal – it can be any statement indicating that the copy is an accurate copy. The distributor shall have a procedure in its quality manual detailing how its procedures for developing a "certified true copy."

Notwithstanding this LI, an accredited distributor is required to follow the written guidance found in its quality manual, as well as the standards to which it is accredited. If this LI contradicts the accredited distributor's quality manual, ASA-100 or AC 00-56A, then the controlling authority is determined in the following order of precedence:

- 1) AC 00-56A
- 2) ASA-100
- 3) Quality Manual

ANTICIPATED FUTURE ACTION:

This interpretation is offered for clarification purposes. It shall be incorporated into the definitions section of a future revision to ASA-100.

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