



The Update Report

The Airline Suppliers Association

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December 1998

LAW YOU CAN USE

Back to Birth Traceability

A foreign air carrier recently asked ASA about "back to birth" traceability. The carrier wanted to know where in the Federal Aviation Regulations it could find the requirement that all parts bear documentation representing "back to birth" traceability. "Back to birth" traceability refers to documentation that clearly demonstrates every owner and installation of a part all the way back to the time that it was manufactured (the "birth" of the part).

This article is divided into two sections. The first section is published in this issue and addresses the general rules and practices concerning traceability for all parts. This first section provides some general guidance on traceability that is useful to everyone in the aviation industry, including employees of air carriers and repair stations as well as distributors. The second section will be published in the January 1999 issue of The Update Report. It will address the special rules and practices applicable to traceability of life-limited parts. These special rules and practices can often be quite different from the general rules applicable to non-life-limited parts. Within the context of these special rules and practices, the reader will find that the term "back-to-birth" traceability is more applicable to life-limited parts than to unserialized parts.

Parts In General

There is no FAA rule that makes "back to birth" traceability mandatory for all aircraft parts. The aviation regulations concerning installation of parts essentially require that the installer have some means of assuring that the installation of the part will return the aircraft or engine assembly to an airworthy condition. The aircraft operation rules require that all of the important documentation associated with an aircraft must be transferred to the new owner at the time of sale, but there is no comparable regulation concerning the sale of a part. This means that there is no regulation that dictates the sort of documentation that is required to accompany an aircraft part during a commercial transaction.

Instead, the sale of aircraft parts is governed by commercial practices. Some of these commercial practices support the regulatory obligations of the customers, some of the practices support their super-regulatory quality concerns, and still others support the customers' economic initiatives. As a commercial measure, there is nothing illegal about a customer asking for "back to birth" traceability.

While it is not required by the rules, some people have championed the notion of "back to birth" traceability as a means of assuring quality in the industry. Some of those have even gone so

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A Message from ASA's President

Last month ASA marked the two-year anniversary of the first ASA compliance audit to ASA-100 and FAA AC 00-56; and ASA has begun to re-certify ASA-100 approved companies (see page 142 of this issue of The Update Report for a list of the companies already re-certified).

While it is sometimes hard to judge the effectiveness of a program, the FAA will have to do just that. Even though it seems recent, several years ago the FAA produced a report on the SUPs Program. The report detailed objectives that the FAA needed to accomplish in order to maintain an effective SUPs Program. The FAA created the report; industry was not permitted to participate. The FAA created the report; industry was not permitted to participate. Congress has been monitoring the FAA to make sure that they incorporated all the objectives. One of the objectives is accreditation of distributors rather than certification.

Ken Reilly, Manager of the FAA SUPs Program Office, stated at the ASA Annual Conference that his office would have to present a report to Congress in 1999 on the effectiveness of the Accreditation Program. He stated that in order to evaluate the program, his office would need to attend several audits as an observer. Since the annual conference, the FAA has observed two accreditation audits and will be attending several more in 1999.

Ava Mims, FAA Manager of the Continuous Airworthiness and Maintenance Division also spoke on this subject at the Annual Conference. She stated that her office is beginning the process of revising the Advisory Circular. Since the conference the

FAA has contacted the Task Force that originally worked on writing the Advisory Circular. While it is impossible to estimate the revision date of the AC, it is safe to say that revising an AC can take substantial time, so don't look for the final revisions in the near future.

ASA looks forward to the FAA and Congress evaluating the accreditation process. The FAA should be proud of the program they developed. The accreditation program has informed, educated and raised the level of quality of parts from not only distributors, but air carriers, repairs stations and manufacturers.

Best wishes to you and your family for a happy and healthy New Year.

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.

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Boeing Y2K Supplier Surveillance

A year from now, will your computers proudly proclaim the advent of the year 2000, or will they disingenuously report the beginning of the year 1900? The Y2K issue is fast approaching, and companies are discovering both hardware and software problems with systems that will not accurately reflect the year after '99.

The Boeing Company has been working on Y2K compliance measures since 1993. Using their expertise in large-scale, complex systems integration, Boeing has been managing the Year 2000 challenge in a methodical and comprehensive manner to ensure the safety of their products and the continuity of business operations. Based on this process, Boeing has determined there are no Year 2000 safety-of-flight concerns related to any Boeing airplanes.

Boeing reached this conclusion by working with its suppliers. It set a goal of preparing computers for the Y2K rollover a year early, by December 31, 1998. Suppliers received questionnaires asking about their software functional areas that use dates. These questionnaires sought specific information that identified whether there was a potential Y2K issue, and whether that issue had the potential to affect safety-of-flight issues.

The search for potential Y2K effects was restricted to systems with embedded software that use a date. This limitation made it possible to narrow the search to exclude systems and components that do not contain embedded software.

While flight safety may not be affected, Boeing has identified some "nuisance flight deck effects" that could occur for a few airborne systems. Having identified these poten-

tial nuisances, Boeing is bringing upgrade programs on-line to replace the affected systems and support uninterrupted service through and beyond the year 2000.

The results of the assessment addressed the following as potentially affected by the Y2K date rollover:

- Airborne systems with date effectiveness checks (including those that contain an embedded navigation database).
 - Flight management system with either the Honeywell or Smiths flight management computer.
 - Inertial navigation system.
- Ground-based software tool.
- Onboard maintenance system.

- Buyer-furnished equipment.

The primary means by which Boeing is disseminating technical information to operators about the Year 2000 (Y2K) rollover is the all-operator telex. Three have been released to date: M-7240-97-0907, dated June 10, 1997; M-7240-97-1765, dated November 4, 1997; and M-7200-98-01196, dated March 27, 1998.

The next phase in Boeing's Y2K readiness plan is assuring that their supply chain will be unaffected. To that end, Boeing has turned its Y2K attention to its suppliers and their compliance efforts. Boeing has published a message concerning its suppliers on its web site (see inset). Suppliers required to respond to Boeing should have received questionnaires already.

Boeing's Supplier Y2K Policy

The Boeing Company considers Year 2000 readiness to be a serious issue. Because our supply chain's position is an important element of our overall readiness, we are assessing the position of our suppliers relative to Year 2000 production readiness (i.e., supply continuity) and product readiness.

In terms of production readiness, we ask many of our suppliers to complete an assessment questionnaire about their internal Year 2000 preparations. The questionnaire covers everything from a supplier's basic awareness of Year 2000 issues to their plans or processes for addressing potential disruptions, for example, as in the areas of utilities and distribution systems.

The Boeing Company also requests Year 2000-specific information from our suppliers on many of the products they produce. The exact nature of the information that we request from any specific supplier varies from product to product and is established by groups of the Boeing Company's highly qualified product experts.

United Also Completing Y2K Review

Boeing isn't the only company in the industry paying attention to the Y2K issue. United Airlines has had a Y2K project underway since 1995 to address every facet of its global operation. The project's goal is to provide safe, uninterrupted service to customers on Jan. 1, 2000, and beyond. So far, United's Y2K team has investigated more than 14,600 items as part of its technical assessment of the company's computer systems and computer-driven equipment.

Currently, about 90 percent of all internally developed software applications have been tested, modified and/or replaced, and remediation of the final 10 percent is expected to be completed by the end of this month.

The man in charge of this project is UAL Y2K Project Director Rick Juster, who explains that "Year 2000 is not a computer issue. It is a business problem. We're reaching out to share information and form common solutions. In fact, airline manufacturers Boeing and Airbus have already assured us their aircraft have no safety or flight issues. We want airline travelers to feel confident that United -

and the industry - will be ready."

Final system integration testing for all information technology (IT) systems that are critical to United's operation is expected to be completed by March 31, 1999. United's non-IT systems, which include baggage systems, fuel systems and building systems, also

will be remediated by March 31, 1999. Final testing for all other secondary systems will be completed by June 30, 1999. United Airlines, staying at the forefront of the Year 2000 issue, also will continue to align its resources with other airlines and other industry stakeholders.

Don't Forget!

Last month, ASA distributed **Confidential Membership Surveys**. The deadline for completing and returning these surveys was December 17th, but not all of the ASA members have completed and returned this information. ASA uses this information to help project an accurate impression of our industry during government affairs work, and also uses it to tailor programs to meet your needs.

If you did not receive your survey or have mislaid it, please call ASA at (202) 216-9140 to ask for a blank survey. Please fax the completed surveys to ASA at (202) 216-9227.

ASA will report aggregate and average industry information gleaned from these surveys in a future issue. Please note that individual company information is confidential and will not be released.

Also, some companies have not yet returned the **Membership Directory Information Form**. It may not be too late to update your company information for the 1999 Directory - but even if the membership Directory has already gone to press, we still need your updated information for our files. Please fax any changes to ASA, ASAP: (202) 216-9227.

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International Business Opportunities

Many business opportunities for ASA members lie in the aftermarket created by major international aviation transactions. Following are business opportunities with governments and entities outside the United States that may be interested in doing business with aviation suppliers. These reports are excerpted from information published by the United States Department of Commerce, International Trade Administration. Expanded and up-to-date information is available from the Office of Aerospace, Market Development Division. Their phone number is (202) 482-2835.

Airbus Building a 555 Seat Aircraft

Airbus is still working on its A3XX project. For those who haven't heard, the project entails the construction of a 555 passenger aircraft (seating in three classes), to be followed by a stretch version (A3XX-200) with 650 seats in three classes! That's far bigger than anything Airbus currently produces: while the A330-300 and the A340-300 each have a maximum certified passenger capacity of 440, the common three-class seating configuration provides seating capacity in the low 300s). Despite its larger size, Airbus estimates that operating costs for the A3XX will be 15-20% lower than those of the 747.

This project is meant to meet a requirement forecast by Airbus economists. They project over the next twenty years (through the year 2017) there will be a need for over 1300 aircraft with a configuration featuring more than 400 seats (the Boeing 747-400 is another aircraft in the 400-500 seat range). Current plans project that the first A3XX will be delivered by 2003.

GE and Pratt & Whitney are jointly

developing the GP7000 series of engines for the A3XX while Rolls Royce will offer the Trent 900. Development of the GP7000 series is expected to cost about US \$800 million and engine testing is planned for the second quarter of 2001.

Airbus is currently seeking major manufacturing partners in this A3XX project. They plan to subcontract up to 40% of the project to other companies. The Airbus contracting contact is Michel Bieler. Telephone 33 5 61 93 33 77; fax 33 5 61 93 32 22. More information is also available from the United States Commercial Service officer, Cara Boulesteix: telephone 33 1 43 12 22 79; fax 33 1 43 12 21 72.

Mexicana and Aeromexico to Keep Maintenance Work at Home

Grupo Cintra is the holding company for Mexicana, AeroMexico, and their subsidiaries. According to *El Financiero* (Mexico's financial newspaper), Grupo Cintra has entered into a joint venture with the Spanish firm ITP to form a new repair station called Industria de Turborreactores.

With an investment of US \$20 million, Industria de Turborreactores will provide service to transport category aircraft including B 727, DC-9, and the MD-80. They will also focus on the TPE-331 and JT8D engines. The company expects annual sales of US \$50 million.

Mexicana and AeroMexico, which both previously sent their engines abroad for repair, will have their work performed by Industria de Turborreactores. Although no contact information is yet available for Industria de Turborreactores, the trade specialist at the American Embassy is Leticia

Perez Sanroman. Leticia can be reached at (525) 525-7436; fax (525) 207-8938.

SAS Replacing its Fleet

Scandinavian Airlines System (SAS) is in the middle of a three-step renewal and expansion process.

The first step was the order for 55 Boeing 737 Next Generation aircraft (mostly 737-600s). These will replace the aging fleet of DC-9s and Fokker F-28s.

The second step is to replace its fleet of 12 Boeing 767 aircraft because they are considered to have insufficient passenger and cargo capacity for its intercontinental flights. SAS is considering bids for new long-range wide-body aircraft from Boeing (777) and Airbus (A330, A340).

The third step is to replace the medium range aircraft in the fleet, particularly the 76 MD-80 and 8 MD-90 aircraft. Although no negotiations have yet begun, SAS is considering aircraft from the Boeing 757 family and the Airbus A320 family. The company has initiated a study focusing on the Airbus A321-100/200 and the Boeing 757-200/300. SAS will need at least ten to twenty aircraft of this size for the Scandinavian capitals triangle, Copenhagen / Oslo / Stockholm. This size aircraft would also be needed for other routes such as London and Paris. If SAS opts for such an aircraft, the first would enter service during the summer of 2001.

Is "Back to Birth" Traceability an FAA Requirement?

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far as to suggest that "back to birth" traceability is sufficiently important that it ought to be in the rules that apply to all aircraft parts.

Other supporters have advanced the notion that failure to trace a part back to its origin renders it unsafe for aviation use. This is not generally true, although there may be special cases where this is true, as this article will describe when it is continued next month.

While "back to birth" traceability is not required by the regulations, the proponents of this form of traceability do make some good points about its utility. This method of documentation can be used as one method of achieving several important safety and regulatory compliance goals during the installation process. The biggest problem with "back to birth" traceability is that it is not always available, particularly for inventories of older parts meant for installation on older types. Often these parts were manufactured during a time when "back-to-birth" traceability of non-life-limited aviation aftermarket parts was less of a concern and thus either "birth" documentation never existed or it was lost at front door to whichever air carrier first owned the inventory. Even today, though, many production approval holders do not provide the buyer with acceptable "birth" documentation when a part is initially sold (making subsequent traceability difficult or impossible). In short, "back to birth" traceability is sometimes impossible even though the parts are demonstrably airworthy.

The Installer's Duties

Installation of a part is a maintenance activity.¹ As such, the installer is required to comply with the rules that

require the work to be done in such a manner as to return the product to an airworthy condition with respect to the work performed. This means that the installer has an obligation to be sure that the parts installed will meet the airworthiness standards of the regulations.² In addition, the installer is responsible for generating records of the work performed.³

Manufacturing "Approved" Parts

With certain special exceptions, it is generally illegal to manufacture avia-

There is no FAA rule that makes "back to birth" traceability mandatory for all aircraft parts.

tion parts or products for the aftermarket unless the producer has permission from the FAA.⁴ The first step to obtaining this permission is design approval. Design approval is granted after FAA engineering has analyzed all of the design information, especially the test results and computations, and determined that part or product meets every applicable airworthiness standard. In the case of a complete airframe or engine, the design approval comes in the form of a type certificate (TC).

The next step is to obtain production authority from the FAA. To do this, the applicant must show the FAA that he has established a production inspection system that assures that the parts produced meet the specifications of an approved design. In the case of aftermarket parts, the design approval

and production approval are often evidenced by the same document - a parts manufacturer approval (PMA) or a technical standard order authorization (TSOA). For a complete airframe or engine, the FAA would issue a production certificate (PC), which is separate from the type certificate.⁵

Installation of "Approved" Parts

By virtue of the FAA oversight and certification, there is a presumption that a part is airworthy for the intended installation(s) at the time that the part was manufactured. That same part bears the same presumption throughout its life. If an installer can verify that the part was originally manufactured under the controls of an FAA-approved manufacturer, then the installer can rely on this presumption at the time of installation.

This presumption of airworthiness does not relieve the installer of the obligation to inspect the part to assure airworthiness. There is a wide world of misadventures that may befall a part from the manufacturer's assembly line to the installer's hands, like shipping damage or expiration of shelf-life. Reliance on traceability to a manufacturer's certification can relieve the installer of the obligation to assure a fundamental baseline of airworthiness - an exercise that must be undertaken when the mechanic intends to install a part for which there is no reasonable assurance of airworthiness.

There are other ways for the installer to establish the baseline airworthiness of the part. Just as an installer can rely on the manufacturer's FAA certificate to affirm that the part is airworthy at the time it left the manufacturer's quality system, an installer can also rely on a finding of airworthiness made by a

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Necessary Traceability, Sufficient Traceability and Airworthiness

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qualified entity during the life of the part. Qualified entities include repair stations,⁶ air carriers⁷ and A & P mechanics.⁸ These are some the parties that are permitted to perform maintenance on parts. Often, they can perform an inspection on a part to assure that it is airworthy, and can then issue documentation to indicate the results of that inspection.⁹

Accreditation as a Form of Traceability

The fact that an installer can rely on a prior finding of airworthiness is the essence of the FAA's advisory circular, AC 00-56. The AC recommends a quality system for distributors of aircraft parts. Companies that successfully implement the appropriate quality system may be accredited and listed in a special FAA database (<http://www.airlinesuppliers.com/accredited.html>). An accredited distributor must follow the documentation matrix in the AC. This matrix dictates what sort of documentation must accompany parts admitted through the receiving inspection system, and parts that are sold by the distributor. Parts that arrive at the facility of the receiving accredited distributor must generally be accompanied by an airworthiness approval, like the 8130-3 or the JAA-1. Parts that are not accompanied by such a form when they are received must bear documentation from the seller that identifies the part and states the condition of the part. This means that even an "as is" part must bear a certified statement from the seller stating that it is in "as is" condition.

The accredited distributor is then required to make appropriate documentation available to the customer. In the case of a part that was originally ac-

companied by an airworthiness approval, the customer should get the original or a copy of the airworthiness approval. In the case of a part that had some other documentation, including an "as is" statement, the buyer should get a statement concerning the identity and condition of the part.

The accredited distributor is also required to retain the original statement that it received in its own files, to promote traceability and to provide a basis for its own statement.

By providing this sort of documentation to the customer, the customer has the best available documentation concerning the condition of the part.

... "back to birth" traceability is sometimes impossible even though the parts are demonstrably airworthy.

Even a buyer of an "as is" part knows without a doubt what the condition of the part is, and what the limitations on the part are (namely, that its airworthiness must be separately ascertained before it is installed).

"Back to birth" traceability is often unrealistic for many unserialized parts. Particularly for older parts designed for older types, the "back to birth" traceability simply does not exist. There are many reasons for this, such as the fact that many air carriers in the past did not retain traceability documents for parts they received. Following successful receiving inspection, air carriers often

would dispose of the accompanying documentation on the grounds that any part in the system had already passed the receiving inspection, and traceability documentation was no longer necessary.

The AC 00-56 system makes a nice alternative to "back to birth" traceability, because it supports and encourages traceability where that is realistic (requiring transmission of appropriate traceability documentation where available) and requires a paper trail to be started where there is inadequate prior traceability.

Installers who obtain parts from AC 00-56 accredited distributors may generally rely on an 8130-3 form indicating that the part is airworthy to the same extent that they could rely on the documents generated by the original production approval holder.

It is worthwhile for a distributor to follow the tenets of AC 00-56 because it supports the requests being made by customers for traceability. At the same time, because it provides traceability to an airworthiness approval, it is more realistic for the aviation industry than a system that requires full "back to birth" traceability (which is often unavailable). Traceability back to a certificated source that signed an airworthiness approval for a part can help provide a suitable foundation for an airworthiness determination by the installer; so the AC 00-56 system provides a benefit for the customer as well as the distributor.

Accreditation is just one tool that a distributor can use to help meet the traceability needs of the customer. Others include FAA designees who may be available to sign 8130-3 forms to begin a new airworthiness paper

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“Back to Birth”

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trail. While these other tools may easily replace "back to birth" traceability form unserialized parts, life-limited parts represent an entirely different issue. In next month's issue of The Update Report, this article will continue with a discussion of life-limited parts, the records that are required for them, and the extent to which "back to birth" traceability supports the recordkeeping requirements for life-limited parts.

ENDNOTES

1. 14 C.F.R. § 1.1.
2. See 14 C.F.R. § 43.13(b).
3. See 14 C.F.R. § 43.9.
4. See 14 C.F.R. § 21.303(a).
5. Note that the Aviation Rulemaking Advisory Committee will soon transmit a recommendation to the FAA that TSOA and PMA each be split into separate design and production approvals. If this recommendation is implemented, then the design and production approval separation for aftermarket part fabrication will mirror the split found in approvals associated with aircraft product fabrication.
6. See 14 C.F.R. Part 145.
7. See 14 C.F.R. Part 121, subpart L.
8. See 14 C.F.R. Part 65.
9. See 14 C.F.R. § 43.9 (requiring the maintenance performer to engage in a recordkeeping activity as a component of the maintenance performed).

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FAA Discontinues Printing Alerts

Much to the chagrin of some aviation maintenance professionals, the FAA has chosen to discontinue the printed version of its *Aviation Maintenance Alerts* in favor of an internet-only version. The December issue is slated to be the last in printed form.

Alerts is read monthly by more than 29,000 mechanics and pilots responsible for aviation safety. *Alerts* reports on maintenance incidents from voluntarily submitted data by mechanics on Malfunction or Defect Report (M & D) forms, which is part of the Service Difficulty Report (SDR) process. Many maintenance personnel enjoy reading through each issue to learn about SDRs that have been filed on various aircraft. This information can lead a mechanic to look for and discover service difficulties under circumstances where the existing manuals would not have required an inspec-

tion.

The FAA Flight Standards Division, which is the office responsible for the decision, argues that their budget is not sufficient to maintain the program.

John Lewis, Technical Services Manager of the Professional Aviation Maintenance Association (PAMA), disagrees with the FAA's decision. PAMA is the trade association that represents A & P mechanics. This is more than just an issue of mechanics not having internet access. He explains that many mechanics peruse the paper version of the *Alerts* and the information "sticks in their head." Then, they will remember the *Alert* information at a later time when they are doing work on the type in question. Lewis is particularly disturbed because a mechanic just can't peruse an internet publication the same way that

mechanics read the *Alerts* today. More important, many mechanics don't like to 'peruse' an internet story the same way that they do with a paper version, so they are less likely to see the material in the first place.

Lewis explains that "to put even one life at risk is irresponsible, especially with the minimal savings expected to be realized from discontinuing the printed *Alerts*. If saving lives through reducing accident rates is the FAA's goal, then the FAA must not discontinue this vital source of safety information in a format accessible to all."

Anyone in the industry who is interested in this issue can contact John Lewis at PAMA. PAMA is located in Washington, DC in the same office building as ASA. PAMA can be reached at (202) 216-9220.

INTERNATIONAL AFFAIRS

FAA Grants First U.S. Type Certificate to Russian Aircraft

The FAA's Small Airplane Directorate has issued the first U.S. type certificate for a Russian type design, clearing the way for import into the United States. The type certificate was issued at a ceremony at the Ilyushin plant attended by senior Russian officials and by U.S. Ambassador James Collins.

The Ilyushin IL-103, an all-metal, two-seat propeller-driven aircraft, was issued Certificate Number A45CE. It is powered by a single 210 HP Teledyne Continental Motors IO-360ES engine with a Hartzell propeller. It was certified in the Utility Category. The certification of the IL-103 was

the culmination of a "shadow certification" program conducted by the FAA's Aircraft Certification Service, its Russian counterparts, the Aviation Register of the Interstate Aviation Committee and the Federal Aviation Authority of Russia, as well as the Ilyushin Aviation Complex, the aircraft manufacturer.

Since 1993, the Russians have demonstrated their expertise in the area of small airplane design and production. A favorable technical assessment of the Russian aircraft certification system led to the signing of a Bilateral Aviation Safety Agreement (BASA) with Implementation Procedures for

Airworthiness (IPA). The BASA IPA outlines how the two countries can reciprocally certify each other's aircraft.

The BASA IPA also provides for the future U.S. acceptance of transport category cargo airplanes with FAA-approved engines, propellers and avionics. Another Russian design project, the Ilyushin 96T, a wide-bodied, transport-category cargo aircraft, is expected to be completed in the future.

FAA Issues Seatbelt, Antenna ADs

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 ADs against parts. One new AD applies against seat restraint systems manufactured by Aircraft Belts, Inc. The AD applies to Model CS, CT, FM, FN, GK, GL, JD, JE, JT, JU, MD, ME, MM, MN, NB, PM, PN, RG, and RH seat restraint systems. These systems are installed on a wide variety of aircraft, including those manufactured by Beech, Bell Helicopter Textron, Cessna, Dassault, Eurocopter Deutschland, Eurocopter France, Gulfstream Aerospace, Learjet, Lockheed, and Piper.

This AD requires all affected owners and operators to inspect to ensure the locking mechanism is engaging properly, and if necessary replacing the buckle-half of the seat restraint system. This amendment is prompted by a report from the manufacturer concerning two failures of the seat restraint system in the field. The actions specified in this AD are intended to prevent failure of the seat restraint system due to the buckle assembly locking mechanism not engaging properly, which could result in the seat restraint system failing to properly secure the occupant during turbulence or landing.

Although this has been published as a

final rule with an effective date of December 24, 1998, the FAA will accept comments on this proposed AD until February 8, 1999. Comments should be submitted in triplicate to the FAA, Office of the Regional Counsel, Southwest Region, Attention: Rules Docket No. 98-SW-33-AD, 2601 Meacham Blvd., Room 663, Fort Worth, Texas 76137.

Distributors with seat restraint systems in their inventory should check to make sure the systems do not fall within the scope of this AD.

Does your organization part-out aircraft or otherwise obtain airframes with their avionics packages intact? If so, this could be an important AD for you! Another recently issued AD applies against BFGoodrich SKYWATCH SKY497 Installations with a Top-Mounted Antenna. In eleven dif-

ferent cases, a SKYWATCH SKY497 with a top-mounted antenna has had an internal component failure that caused it to treat data as if it came from a bottom-mounted antenna (e.g. an object at 9:00 will read as if it were at 3:00). As a consequence, the FAA has ordered that operators test their assemblies to assure that they are in good working order. This test is to be performed each time the aircraft is powered up! This is information that the owners of this equipment need to know.

The equipment in question is installed on at least 28 different types of aircraft. Complete information is available in the full text of the AD. The complete text of each of these ADs is available on ASA's web site.

Around the Industry

Litton Systems received a judgment against **Honeywell** for \$250 million. Litton had claimed that Honeywell had illegally monopolized the commercial aircraft market for inertial reference systems. The Judge is reviewing the post-trial motions but if he enters the final judgement as it stands, it could treble to \$750 million under the penalty provisions of the antitrust laws.

Hubair joined **Avio-Diepen**, **Avio-support**, **AVTEAM**, and **International Aircraft Associates** as companies that have been recertified to ASA-100 following an initial two year period of accreditation. Congratulations to all on passing their re-accreditation audits!

The GAO recently completed a study

on emergency certificate action. A certificate action involves the revocation or suspension of a certificate (e.g. pilots license, repair station certificate, etc.). The FAA closed 137,506 enforcement cases during fiscal years 1990 through 1997. During that time period, the percentage of enforcement cases that become certificate actions increased from 10% of the cases to 20% of the cases. In 3% of cases, the FAA used an emergency order to revoke or suspend a certificate immediately, without waiting for normal due process. Every certificate action means one less potential customer., so educate your customers about safe and legal operations and help them keep their certificates!

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UPCOMING EVENTS

** = ASA will be speaking there*

1999

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