

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-015

EFFECTIVE DATE: June 15, 2010

TERMINATION DATE: Until Superseded or Incorporated in ASA-100

ISSUE: Traceability to FAA Certificate Holder

AFFECTED SECTIONS: ASA-100 Revision 3.5 para. 5.A and 10.D

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 ASA-100 Standard currently requires traceability to the source of production or to a FAA certificate holder for both Procurement (paragraph 5.A) and Certification and Release of Materials (paragraph 10.D).

The purpose of the language change is to correct outdated language in the ASA-100 standard that has inhibited certain international transactions. The language continues to be consistent with the AC 00-56A standard because the ASA-100 language that is being amended is more restrictive than the AC 00-56A requirements.

The ASA-100 documentation matrix is similar to the documentation matrix found in FAA Advisory Circular (AC) 00-56A (Voluntary Industry Distributor Accreditation Program). When the AC 00-56A documentation matrix was first written, it anticipated only the needs of FAA-regulated parties in assessing what was appropriate within the matrix. As a consequence, the provision for used equipment that has been maintained is limited to US and Canadian approval for return to service (under 14 C.F.R. §§ 43.9, 43.11 or 43.17). Approval for return to service that is not issued by a US (or Canadian) certificate holder is effectively precluded by paragraphs 5.A and 10.D. However, the catch-all provision in the documentation matrix for parts that do not meet some other requirement would still apply to such parts – it would require that they be accurately described.

Section 5.A requires the distributor to maintain a procurement system such that materials purchased conform to specified documentation requirements in Appendix A of the Standard. The distributor is required to have documented in its quality manual, as a system that demonstrates the ability to trace the parts to the source of procurement and to the source of production, or to a FAA certificate holder. In addition, the distributor is required, upon request, to provide information pertaining to the production approval status of each part.

Questions/Inquiries should be addressed to:
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Section 10.D requires the distributor to have a system documented in its quality manual which demonstrates the ability to trace the parts to the source of production or to a FAA certificate holder. In addition, the distributor is required to be able to provide, upon request, information pertaining to the approval status of each part.

INTERPRETATION:

The Association has decided to change the language in section 5A and 10D in the ASA-100 Standard.

Section 5.A shall now state the following:

The distributor shall maintain a procurement system such that materials and components purchased (1) are traceable to a prior source and (2) bear acceptable documentation that conforms to at least one of the receipt requirements listed in Appendix A.

Section 10.D shall now state the following:

The distributor shall have a system documented in its quality manual which demonstrates that released material and components are traceable according to the Procurement Requirements of this Standard.

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 to reflect the decision made by the Association to change the language based on the current requirements listed in FAA Advisory Circular 00-56A and the current business scope of distributors. The change in the language still requires traceability, but it is no longer limited to traceability to an FAA certificate holder. Pursuant to the requirements of the documentation matrix, parts that are traceable purely to a non-US certificate holder would be required to be accurately disclosed as such.

In the next revision to ASA-100, sections 5.A and 10.D shall be changed to read:

Section 5.A

The distributor shall maintain a procurement system such that materials and components purchased (1) are traceable to a prior source and (2) bear acceptable documentation that conforms to at least one of the receipt requirements listed in Appendix A.

Section 10.D

The distributor shall have a system documented in its quality manual which demonstrates that released material and components are traceable according to the Procurement Requirements of this Standard.

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