

Airline Suppliers Association Accreditation Program Letter of Interpretation (LI) 100-006A

EFFECTIVE DATE: *January 1, 2001.*

TERMINATION DATE: *December 31, 2001.*

ISSUE: Defining the term " distributor of new standard parts."

AFFECTED SECTIONS: ASA-100 Revision 3.2 § 6(C) and ASA-100 Revision 3.3 § 6(E).

BACKGROUND:

The ASA-100 quality system requires that an accredited distributor meet the requirements of both ASA-100 and the FAA Advisory Circular AC 00-56 (Voluntary Industry Distributor Accreditation Program). ASA-100 Revision 3.2 § 6(C) and ASA-100 Revision 3.3 § 6(E) requires a distributor who purchases new standard parts from the manufacturer to have a process for periodically assuring that the parts meet the standards to which they were manufactured. This provision came from a similarly worded element of the CASE standard.

There is a distinction between regular authorized distributors and occasional purchasers with respect to responsibility for testing and checking parts. Regular authorized distributors have an ongoing relationship with the manufacturer of the standard parts such that it is reasonable for the regular authorized distributor to periodically check lots of parts to confirm that they meet the design/performance requirements to which they were manufactured. This confirmation may occur through a review of the testing documentation, or through spot-testing on the part of the distributor. The relationship between the distributor and the manufacturer may be represented through a licensing agreement or other contract, but it does not have to be reflected in this way.

It is not reasonable to require occasional purchasers of standard parts to perform such confirmation. Such persons often do not reasonably have access to the appropriate standards to which the parts were manufactured, nor do they commonly have the appropriate infrastructure to perform the tests or inspections necessary to assure that the parts meet the standards to which they were manufactured. ASA-100 Revision 3.2 § 6(C) and ASA-100 Revision 3.3 § 6(E) was not meant to require an occasional purchaser to make this confirmation for one-time-only sales.

The distinction between regular authorized distributors and occasional purchasers was clear to the industry in the past. One of the elements that has confused this distinction is the fact that the definition of the term "distributor" has changed. Where this term once described companies that had an ongoing relationship with a manufacturer to sell the manufacturer's new parts, it has been broadened in FAA Advisory Circular 00-56 (Voluntary Industry Distributor Accreditation Program). The new definition of the term includes all persons and agencies engaged in the sale of parts for installation in type-certificated products and appliances.

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

RESOLUTION:

The phrase "a distributor of new standard parts purchased from a manufacturer," shall mean any distributor that engages in a regular pattern and practice of purchasing new standard parts directly from a manufacturer, subject to the following interpretive statements

For the purposes of ASA-100 Revision 3.2 § 6(C) and ASA-100 Revision 3.3 § 6(E), "new parts" are parts purchased directly from the manufacturer in new, unused condition. New surplus parts are not included in this definition.

For the purposes of ASA-100 Revision 3.2 § 6(C) and ASA-100 Revision 3.3 § 6(E), "standard parts" are parts that meet the definition of "standard parts" currently recognized by the FAA, as that term is used in 14 C.F.R. § 21.303(b).

For the purposes of ASA-100 Revision 3.2 § 6(C) and ASA-100 Revision 3.3 § 6(E), the term "a part that is purchased from a manufacturer" only includes parts that are purchased directly from the company that produced them. This term includes parts purchased from a company that markets parts under its own corporate name even though it may contract-out the actual fabrication to a different company. This term does not include new surplus parts purchased from an air carrier, nor does it include new parts purchased from any other distributor or third-party.

Regardless of this LI, an accredited distributor will be 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 00-56, then the controlling authority is determined in the following order of precedence:

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

ANTICIPATED FUTURE ACTION:

This interpretation is offered for clarification purposes only. No further activity is anticipated at this time.

**QUESTIONS/INQUIRES SHOULD BE ADDRESSED TO:
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