

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-010

EFFECTIVE DATE: October 1, 2005

TERMINATION DATE: Until Superseded or Incorporated in ASA-100

ISSUE: Confirming Current Life Status

AFFECTED SECTIONS: ASA-100 Revision 3.4 § 12 (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).

Paragraph 6 (m) of AC 00-56A requires that the distributor's quality system have "Procedures for maintaining documentation" and that such procedures must include any "documents used to establish the condition and origin of parts received and shipped." Although AC 00-56A does not mention life-limited parts, FAA regulations require that the owner/operator of an aircraft must retain sufficient documentation to establish current life status of each life-limited part in that aircraft. 14 C.F.R. § 91.417(a)(2)(ii).

The FAA Office of the Chief Counsel has issued guidance on this subject, explaining that this section is not meant to require 'back-to-birth' traceability for life-limited parts; rather, an owner/operator only needs sufficient documentation to ascertain current life status. FAA Chief Counsel's Opinion, 1992-35 (June 1, 1992). The Chief Counsel's opinion explicitly explains that requirements for 'back-to-birth' traceability would be considered the exception, rather than the norm. Id.

Section 12(D) of ASA-100 states that "All life limited parts shall have records confirming life limited status." This language is meant to ensure that the records associated with life-limited parts are adequate to permit a determination of current life status.

It is not uncommon for certain parties in the industry to desire 'back-to-birth' traceability of life-limited parts as a commercial requirement. Such a requirement permits review of the documentation trail to confirm the statement of current life status. Among those unfamiliar with the Chief Counsel's Opinion Letter, the language of section 12(D) may be susceptible to misinterpretation as a mandate for back-to-birth traceability.

In order to best reflect the standards established by the regulations and interpretive guidance, the language of section 12 (D) shall be interpreted in a manner consistent with those current regulations, interpretations and standards.

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:

In order to best reflect the standards established by the regulations and interpretive guidance, the phrase “records confirming life limited status” in section 12 (D) shall be interpreted to mean “records confirming current life limited status.”

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. The language of section 12 (D) shall be modified in the next revision to ASA-100 to read: “All life limited parts shall have records, traceable to a FAA-certificated source or other acceptable source (in accordance with AC 00-56A para. 4(h)), confirming current life status.”

**QUESTIONS/INQUIRES SHOULD BE ADDRESSED TO:
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