

## **Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-011**

**EFFECTIVE DATE:** October 1, 2005

**TERMINATION DATE:** Until Superseded or Incorporated in ASA-100

**ISSUE:** Notification

**AFFECTED SECTIONS:** ASA-100 Revision 3.4 § 8 (J)

---

### **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).

The original version of AC 00-56 required that the quality system of an accredited distributor must have a system for notifying customers and the accreditation organization in the event of certain types of non-conformities. AC 00-56 paras. 5 (B)(5) and 5 (B)(6). Section 8 (J) implemented this requirement, following a decision of the Association reflected in LOI 100-002A. The relevant advisory circular language was removed from the advisory circular when it was revised and reissued as AC 00-56A.

ASA 100 section 8 (J) is not necessary. As an accreditation organization, ASA receives few, if any, reports of nonconformities pursuant to ASA-100 section 8 (J).

The ASA-100 section 8 (J) notifications are adequately supported by other requirements in the standard. Where there is a failure of the quality system, it will be identified under the self-audit program (section 2 (A)) and corrected pursuant to section 2 (A)(1). If the correction reflects a significant change in the system then the accreditation organization must be notified (section 1 (D)). Customer notifications, as necessary, are supported by section 8 (C), which requires the distributor to have documentation that would permit a recall as necessary, and section 5 (B), which requires deviations to be disclosed to the customer. Further, the quality system is required to be a closed-loop system under paragraph 8 (H).

Section 8 (J) of ASA-100 is no longer supported by the relevant advisory circular. It appears to have little practical effect in the industry and it appears to require notifications that may not be necessary in some circumstances. Notification of customers and accreditation organizations of incidents of mere misshipments, has been removed from the advisory circular.

Section 8 (J) is removed from the ASA-100 standard.

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 Association has decided to remove Section 8 (J) from the ASA-100 standard. Section 8 (J) shall henceforth be treated as if it were removed from the ASA-100 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 a decision of the Association to change the standard based on a change to the underlying Advisory Circular. Section 8 (J) shall be removed in the next revision to ASA-100.

**QUESTIONS/INQUIRES SHOULD BE ADDRESSED TO:  
AVIATION SUPPLIERS ASSOCIATION  
734 15<sup>th</sup> STREET, NW, SUITE 620, WASHINGTON, DC 20005  
TELEPHONE: (202) 347-6895 - FACSIMILE: (202) 347-6894  
EMAIL: [accreditation@aviationsuppliers.org](mailto:accreditation@aviationsuppliers.org)**