

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-008

EFFECTIVE DATE: January 1, 2005

TERMINATION DATE: December 31, 2005

ISSUE: What is an "original certified statement?"

AFFECTED SECTIONS: ASA-100 Revision 3.4 § 10 (E); Appendix A

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 documentation matrix of AC 00-56A describes the documentation appropriate for accredited distributors. For shipments of new parts, products, and appliances that are received without regulatory airworthiness approval documents, that matrix requires that a distributor obtain a certified statement from the seller as to identity and condition. The matrix also provides that the distributor shall provide to the customer (at the time of sale) a statement as to identity and condition and that the original certified statement is on file.

The documentation matrix of AC 00-56A also states that for shipments of used parts, products, and appliances without approval for return to service, the distributor should receive a certified statement from seller as to identity and condition (using a term like "as is" to describe condition). The distributor would then provide to its customer a statement as to identity and condition and that the original certified statement is on file.

In addition to the requirements of the AC 00-56A documentation matrix, ASA-100 Revision 3.4 § 10(E) requires a distributor to have a procedure in place for accountability of duplicate documents, when copies of material certification documents used for redistribution shipments are made. This provision is supported by FAA AC 00-56A § 6(K).

An issue has arisen concerning interpretation of the term "original certified statement." Some parties have interpreted this to mean original copies of shipping document. This can be a problem because sometimes original shipping documents are not available, and only copies are available. It was not the intention of the FAA nor industry at the time that AC 00-56 or AC 00-56A was drafted that the term original refer to anything other than the certified statement received from the seller. The intention at the time of drafting was that the distributor would obtain a statement from the seller concerning identity and condition, and then at the time of sale the distributor would pass along a statement concerning identity and condition based on the documentation it had received, and would also certify that the document it had received from the seller was retained on file. The reference to the original certified statement being on file only means that the documents that the distributor received for these parts would be retained and maintained on file.

ASA has coordinated this interpretation with the FAA. The FAA recognizes and acknowledges that the term “original certified statement” as used in FAA AC 00-56 (as revised) reflects the statement received by the distributor at the time of purchase of the article.

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 term "original certified statement," shall mean the statement received by the distributor from the party that provided the article to the distributor in accordance with the **REQUIRED ON RECEIPT** column of the documentation matrix of AC 00-56A (as revised). The distributor shall have a procedure in its quality manual detailing its procedures for receiving and retaining such “original certified statements.”

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. It shall be incorporated into the definitions section of a future revision to ASA-100.

Questions/Inquiries should be addressed to:
Aviation Suppliers Association
2233 Wisconsin Avenue, NW, Suite 503, Washington, DC 20007
Telephone: (202) 347-6899 - Facsimile: (202) 347-6894
Email: accreditation@aviationsuppliers.org