

Aviation Suppliers Association Accreditation Program (ASAAP)
Letter of Interpretation (LI) 100-016

EFFECTIVE DATE: January 1, 2011

TERMINATION DATE: When superseded by revision of ASA-100

ISSUE: Removing limits on use of AC 00-56A for global distribution

AFFECTED SECTIONS: ASA-100 Revision 3.5 §§ 10 (A, C)

BACKGROUND:

Under the Chicago Convention, the nation in which an aircraft is registered is the nation whose laws will apply to maintenance activities on that aircraft.

In the global marketplace, it is becoming more common for distributors to obtain components subject to work performed by NON-FAA approved repair stations; such components are instead approved for return to service by maintenance providers that have been certificated by a national aviation authority other than the FAA. Such parts are obtained with the intent that they be sold to operators who operate aircraft registered in the nation that issued the repair station certificate, in accordance with the Chicago Convention.

For example, a distributor might obtain a component that was overhauled by a repair station in Europe and tagged with an EASA Form One. Such a component can be useful for a European customer flying an aircraft subject to one of the European Community registries. Under current commercial standards, this hypothetical component is recognized as serviceable for such European customers.

The problem that arises is that ASA-100 does not currently recognize such components as being "serviceable" parts. This is because ASA-100 was originally drafted to support the United States market. One particular impediment to international trade is the language in section 10.C. of the standard, which limits the definition of "serviceable parts" to those bearing documentation from a U.S. FAA certificate holder.

In order to update ASA-100 to reflect the commercial realities of the global marketplace, the language of section 10.C. limiting the definition of "serviceable" parts to only those bearing U.S. documentation must be removed.

Instead of trying to limit the scope of serviceability, the ASA-100 standard will continue to rely on the documentation matrix as a standard method of providing information about parts to operators and other subsequent users. Section 10.A. of the ASA-100 shall continue to point to the Appendix as the source of standard industry documentation requirements.

The remainder of 10.C. has been deemed to be unnecessary. Each element of the additional language of section 10.C. suffers from infirmities of being either redundant of guidance elsewhere in the standard, redundant of U.S. regulatory requirements or merely advisory in nature. For example, the signature requirement of section 10.C is adequately covered

elsewhere under sections 5(d)(3) and 11(b)(7). Several of the requirements of this section are U.S. focused and may be inapplicable in a global setting.

Finally, a review of section 10.C. (in the context of the remainder of the ASA-100 standard) and comparison to AC 00-56A has shown that section 10.C. is not required by AC 00-56A.

For these reasons, the remainder of section 10.C. is also being eliminated.

The changes to section 10.C. look like this:

~~C. The distributor shall provide a document from an FAA approved repair station or air carrier for each serviceable part indicating that the part is serviceable (not applicable to new parts unless work or test was performed on the part). The document shall contain a maintenance release statement for return to service signed by an authorized individual of the repair station. The maintenance release shall be SIGNED! Inspection stamps, or symbols, or printed/stamped names are not acceptable. Refer to FAR 43, appendix B, for examples of a maintenance release statement for air carrier work. Refer also to FAA Notice 8130.21 for procedures for completion and use of FAA Form 8130-3, Airworthiness Approval Tag, for approval for return to service. A copy of the teardown report that describes the condition found at overhaul and list of significant parts replaced should be included. [RESERVED]~~

Finally, section 10.A. is amended to make it clear that the accredited distributor will provide the documentation "required for shipment" from Appendix A. The language in the standard requiring "certification" is changed to "documentation" because the requirements found in Appendix A include requirements that are not strictly "certifications." The language of Appendix A comes from the FAA's Advisory Circular, and this change clarifies that the requirements of the Advisory Circular must be followed by accredited distributors, regardless of whether they have been characterized as certifications.

The changes to section 10.A. look like this:

A. The distributor shall provide the customer with ~~certification documentation~~ in accordance with the "Required for Shipment" column of Appendix A of this Standard. The distributor shall have a procedure in its quality manual detailing how it creates a Certified True Copy when such a copy is required for shipment.

Effective Changes and Interpretation

Section 10, "Certification and Release of Materials," subsection A, shall be amended in the next revision of ASA-100 to read as follows:

A. The distributor shall provide the customer with documentation in accordance with the "Required for Shipment" column of Appendix A of this Standard. The distributor shall have a procedure in its quality manual detailing how it creates a Certified True Copy when such a copy is required for shipment.

Pending change to ASA-100, as of the effective date of this LI, Section 10, Subsection A shall be interpreted consistently with this change.

Section 10, "Certification and Release of Materials," subsection C, shall be removed and the subsection shall be reserved for future use.

Because this clause is inconsistent with industry practice and global service, pending change to ASA-100, as of the effective date of this LI, Section 10, Subsection C shall no longer be enforced as written.

To reduce confusion in the industry, this Letter of Interpretation (LI) provides notice of a future change to the ASA-100 standard as well as a current interpretation of certain subsections of ASA-100. This LI applies only to ASA-100, and is not applicable to any other document.

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. Text removed from the standard by this LI may be retained and utilized in a distributor's manual, at the discretion of the distributor. 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) LI
- 3) ASA-100
- 4) Quality Manual

ANTICIPATED FUTURE ACTION:

This interpretation is offered for clarification purposes. Elements of it are effective as of the date published above. It shall also be implemented in the next revision of ASA-100.

QUESTIONS/INQUIRES SHOULD BE ADDRESSED TO:
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