

# 2012 ASA Quality Assurance Committee Meeting

Government Affairs Updates and  
Quality System Document Changes

Supplemental Materials

# US-EU Background

- Acceptance of parts between the US and the EU is governed by a “bilateral” agreement
- Implementation is governed by Technical Implementation Procedures (TIP)
- The US-EU BASA TIP was revised on October 22, 2012

# Standard Parts From Europe

“Standard Part” means a part that is manufactured in accordance with an established government or industry-accepted specification, which includes design, manufacturing, and uniform identification requirements. The specification must include all information necessary to produce and conform the part, and must be published so that any person or organization may manufacture the part.

BASA TIP ¶ 1.6(hh)

# Standard Parts Under EASA Rules

- Europe recognizes the TC holder's proprietary standards as standard parts
- Standard parts must be shown to have been made in accordance with officially recognized standards. EASA 21A.303
- **EASA GM No. 1 to 21A.303(c) Standard Parts**

In this context a part is considered as a “standard part” where it is designated as such by the design approval holder responsible for the product, part or appliance, in which the part is intended to be used. In order to be considered a “standard part”, all design, manufacturing, inspection data and marking requirements necessary to demonstrate conformity of that part should be in the public domain and published or established as part of officially recognised Standards.

# Standard Parts From Europe

- **AMC No. 2 to 21A.130(b) (A)(3)**

Where a part is identified by the design holder in accordance with officially recognised Standards, then the part is considered a Standard Part and release with an EASA Form 1 is not necessary.

- **AMC M.A.501(c)**

2. To designate a part as a standard part the TC holder may issue a standard parts manual accepted by the competent authority of original TC holder ....

4. An EASA Form 1 or equivalent is not normally issued and therefore none should be expected.

- **BASA “standard part” definition does not include proprietary standards**

- **For acceptance in the U.S., the BASA requires EASA Form 1 on parts that are not standard parts**

# European Standard Parts: Status

- We have discussed this issue with both FAA and EASA
- Next step: work with FAA's International Certification Office to make this a formal change proposal

# Parts Eligibility from US

- Canada, the US, and Europe have been working to remove the eligibility information from standard airworthiness approval documentation
  - Block nine has been “N/A” in the 8130-3
  - It was removed in the European and Canadian forms
  - It is scheduled to be removed entirely from 8130-3 in revision “H” to 8130.21

# Parts Eligibility from US

- October 22, 2012 revision to the BASA TIP
  - U.S. and EU agreed that parts from the U.S. must identify eligibility
  - “Information concerning the manufacturer’s name and model designation of the type certificated product for which the part is eligible for installation must be furnished with the part.”  
BASA TIP ¶ 5.5.2(a)(5)

# Parts Eligibility

- We have discussed this issue with FAA management
- Next steps:
  - Educate FAA employees referred by management
  - Work with FAA's International Certification Office to make a formal change proposal

# “Critical”

- This root term is used in several (different) ways by the FAA
  - In guidance to distinguish parts that require a greater commitment of FAA resources for certification
  - In Part 21 to distinguish parts that must be uniquely tracked
  - For US export purposes, to distinguish EASA acceptance of PMA parts
- Such uses are distinct, and subject to different definitions!

# EASA Also Has Distinct Connotations to the Term “Critical”

- **For rotorcraft:** CS 27-29-VLR.602(a): A critical part is a part, the failure of which could have a catastrophic effect upon the rotorcraft, and for which critical characteristics have been identified which must be controlled to ensure the required level of integrity.
- **For engines, propellers and APUs:** If the Failure of a part is likely to result in a Major Engine Effect or a Hazardous Engine Effects, then the part must be listed as a critical part in order to support the objective of an Extremely Remote probability of Failure.
- **In the EU-US bilateral:**  
A "Critical component" means a part identified as critical by the design approval holder during the product type validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer's maintenance manual or Instructions for Continued Airworthiness.

# Let's Look at How the Term is Used Relation to PMA Exports into Europe

- In order to be directly acceptable in the European Union (*without further showing*), a PMA part must fit into at least one of these categories:
  1. PMA part is NOT a “critical component”
  2. PMA by licensing agreement from the TC or STC holder
  3. PMA holder holds an EASA STC that incorporates the PMA part

# Let's look at the Definition that Matters to the European Union

- “Critical Component” means a part identified as critical by the design approval holder during the product type validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer’s maintenance manual or Instructions for Continued Airworthiness. Technical Implementation Procedures for Airworthiness and Environmental Certification Between the FAA and EASA para. 1.6(i) (rev. 2, Oct. 22, 2012).

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# Identifying Critical Parts

- Generally
  - The design approval holder (PMA holder) will determine whether it is critical
    - Contact the PMA holder if you have questions
  - Determination based on airworthiness limitations
- Unusual cases
  - The exporting government (FAA) reserves the right to identify an airworthiness limitation
  - Could be imposed by an airworthiness directive

# PMA Criticality – Issue Summary

- Bilateral requires that exported PMAs bear certain language if “non-critical.” BASA TIP ¶ 5.1.8(b)(1)(i)
- **“Critical” PMAs are those described by the design approval holder (in approved design) or the exporting authority as “critical.” BASA TIP ¶ 1.6(i).**
- Certain engineers have erroneously mis-described non-critical PMAs as “critical,” leading to confusion

# Parts Criticality

- We have discussed this issue with FAA and EASA management
- Next steps:
  - Continue to educate industry and authority employees

# Questions?

# Notice of Proposed Amendment: EASA Supplier Oversight

# Background

- Europe has had a long-standing action item to examine distributor oversight and control
- ToR/Workgroup 145.017
- NPA 2012-03. *“Control of suppliers of components and material used in maintenance.”*

# Rule Development Mechanism

- Six participants on the EASA Working Group (started middle of 2011)
  - ASA
  - EASA
  - UK CAA
  - Austrian CAA
  - Rolls-Royce
  - Alenia

# Net Result

- EASA recognizes accreditation as a means by which 145 organizations can
  - Better assure the quality level of their suppliers
  - Be more confident in the quality of the parts

# Movements Within the Rules

- The segregation and documentation requirements of EASA 145.A.42(a) would remain unchanged, but they would be moved to EASA 145.A.42(e)
- This would make room for a new EASA 145.A.42(a)

# EASA 145.A.42 (a)

- New text
- *(a) The organisation shall establish procedures for the acceptance of components and material.*

# EASA 145.A.42 (a)

- *(a) The organisation shall establish procedures for the acceptance of components and material.*
- A request for such procedures is already found in the advisory material, which establishes this as an element of the Maintenance Exposition

# New AMC 145.A.42 (a)

- **AMC 145.A.42 (a) Acceptance of components**
- The procedures for acceptance of components should have the objective of ensuring that the supplied components and material are in satisfactory condition and meet the organisation's requirements. These procedures may be based upon:
  - 1) incoming inspections which include:
    - physical inspection of components and/or material;
    - review of accompanying documentation and data, which should be acceptable in accordance with 145.A.42(e).
  - 2) supplier evaluation and control.

# New AMC 145.A.42 (b)

- Requires the 145 organization to establish a procedure to determine eligibility before installation. The procedure should specify how the organization:
  - Ensures the component is in satisfactory condition,
  - Ensures compliance with the applicable Critical Design Configuration Control Limitations (CDCCLs),
  - Ensures Airworthiness Directive compliance, and
  - Ensures proper modification status.

# GM 145.A.42 (a)(1)

Elements and procedures to identify during supplier' audits:

- Access to regulations, specifications and standards;
- Training and competency assessment;
- Shelf-life control;
- ESD;
- Source identification;
- Purchasing (including documentation);
- Receiving inspection;
- Measuring equipment control and calibration;
- Adequate storage;
- Packing and shipping;
- SUPs detection and reporting;
- Scrap parts
- Batch splitting;
- Customer notification of non-conformities;
- Recall control;
- Self-audit.

# GM 145.A.42 (a)(2)

- Suppliers certified to officially recognised standards that have a quality system that includes the elements specified in 1) may be acceptable; such standards include:
  - a. EN/AS9120 and listed in the OASIS database;
  - b. ASA-100;
  - c. EASO 2012;
  - d. FAA AC00-56.
- The use of such suppliers does not exempt the organisation from its obligations under 145.A.42 to ensure that supplied components and material are in satisfactory condition and meet the applicable criteria of 145.A.42(e).

# Questions?

# Upcoming Changes: BIS/ITAR Rules

- State Department and Commerce Department continue to work on export regulation changes
- Proposed rule would move most dual-use items firmly into Commerce Department's export control
- Scuttlebutt in Washington is that many of the benefits of the proposed rules are being watered-down

# Upcoming Changes: FAA Part 21 Revision (including SMS)

- FAA has convened an Aviation Rulemaking Committee (ARC)
  - Originally thought to address SMS, it has quickly adopted all of Part 21 as its scope
  - Scope would include the 8130-3 rules
  - The ARC is in its early meeting stages

# Upcoming Changes:

## Maintenance Regulation Revisions

- FAA has proposed major changes to Part 145 rating system, as well as many minor changes
  - Many of these changes were objectionable, in that they increased burden but failed to improve safety
  - ASA filed comments in opposition
- FAA has just issued NPRM on air carrier contract maintenance
  - Pro: Emphasizes that repair stations are entitled to air carrier maintenance instructions because they are extensions of the air carrier's maintenance program
  - Con: Requires "acceptable" policies and procedures but fails to establish metrics for what is considered acceptable
  - Comment period open through Feb. 11, 2013

# Upcoming Changes:

## TSA Repair Station Security Rule

- Good news: the TSA repair station security rule will be out by the end of the year
- Bad news: but not THIS year!
- TSA insists that their inspectors will be careful about the manner in which they implement and enforce the rule, but relying on inspector forbearance is a dangerous equation

# Questions?

# Proposed Change to ASA-100 § 8 (I)

- **(I) Scrapped Parts:** There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, or other appropriate means. When the distributor chooses to scrap a part, the part shall be mutilated to the extent necessary to preclude the possibility of it being restored and returned to service. For additional information see ASA Best Practice – Disposition of Unsalvageable Aircraft Parts.
  1. The distributor shall maintain a record of all serialized and/or life-limited parts scrapped out. The record shall contain a description of the part, its part number, serial number (if applicable), and the date the part was scrapped. The distributor shall retain this record for at least seven years. Retaining any other records for the scrapped parts shall be at the discretion of the distributor.
  2. The procedure shall identify, by title or position, the individual responsible for verifying that parts were adequately mutilated before being discarded.
  3. The distributor shall impose these same requirements on the subcontractors and/or repair facilities that scrap parts as agents of the distributor.

# Questions?

# Existing Document Retention Requirements and Recommendations

- (1) When Parts are Scrapped, and
- (2) When Assets (Aircraft/Engines) Are  
Disassembled

# U.S. (FAA) Regulations

- No requirement to retain documentation of scrapped parts
- When the aircraft is deregistered, there is no longer any requirement to retain records of a disassembled aircraft
  - While on the U.S. registry, Part 91 document retention requirements continue to apply!

# Some Recommendations

- AFRA Best Management Practices (BMP) for Management of Used Aircraft Parts and Assemblies
  - *Article V d) – Parts*
    - **BEST PRACTICE (V)(d) 1** – The Facility shall maintain a record of each part removed from the Asset.
    - **BEST PRACTICE (V)(d) 2** – Following disassembly, the records associated with the Asset shall be returned to the Customer or handled according to the Agreement between the Facility and the Customer.

# AFRA BMP Practice Guides

- **BEST PRACTICE (V)(d) 2** – Following disassembly, the records associated with the Asset shall be returned to the Customer or handled according to the Agreement between the Facility and the Customer.
  - **Practice Guides:**
    1. The records belong to the Customer, so this matter is at the option of the Customer.
    2. The Facility may continue to store records associated with the disassembled Asset.
    3. The records belong to the Asset owner, but where that is not the Facility, the Facility may agree to retain them on behalf of the owner.
    4. If the records are held on behalf of the Asset owner, then the period and method of retaining the records should be based on the needs and requirements of the Asset owner, which will often be reflected in a contractual agreement.
    5. There are several commercially viable options for assisting the Asset owner with record-keeping. For example, the Facility may store the original records in a storage area for the customer. The Facility may also convert the records to digital/electronic media and supply that to the customer. Record-keeping should conform to applicable regulatory authority requirements.

# What Are Your Company's Document Retention Policies When Parts are Scrapped?

- Which documents should be retained?
  - Maintenance records
  - LLP status records
  - Scrap verification
- How should they be retained?
- Who should receive copies of them?
- Who should retain “originals?”
- For how long should they be retained?

# What Are Your Company's Document Retention Policies When Assets (Aircraft/Engines) Are Disassembled?

- Which documents should be retained?
  - Maintenance records
  - LLP status records
  - Aircraft flight time logs
  - Crew time logs
- How should they be retained?
- Who should retain them?
- For how long?

# Thank You!