

# MAG 6 and 8130-3 Tags - Status Update

2017 ASA Annual Conference  
Quality Assurance Committee

# A Change in the Traceability Paradigm

- The FAA-EASA Maintenance Annex Guidance established a new requirement for dual-certified repair stations
- For new components, they must receive:
  - US PAH: 8130-3
  - EU PAH: EASA Form One
  - Canada PAH: TCCA Form One
  - Standard Parts: C of C



# What Do the Members Say?

- ASA surveyed its members
- 29 responses

# What Do the Members Say?

## Do You have Parts Without 8130-3 tags?

- **Do you have aircraft parts inventory that is affected by the requirement for an 8130-3 (e.g. inventory that does not bear an 8130-3 tag)**
- **100% Yes**

# What Do the Members Say? How Much Inventory Without 8130-3?

- **Approximately how much of your aircraft parts inventory does NOT have 8130-3 tags or other comparable airworthiness documentation (for example, EASA Form One)?**
- **Fairly evenly split across the spectrum (from 10% to 100%)**

# What Do the Members Say? Trouble Selling Without 8130-3?

- Do you feel that you will have trouble selling the aircraft parts that do NOT have 8130-3 tags or other comparable airworthiness documentation (for example, EASA Form One)?



# What Do the Members Say?

## Trouble Selling Without 8130-3?

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# What Do the Members Say?

## Strategies for Getting 8130-3 tags

- Which of the following strategies have you used to try to obtain 8130-3 tags for aircraft parts in the past year (please check all that apply)?



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# Member Comments

- Members asked us to make the DAR-56 program permanent and also to expand it to include new parts traceable to a 145 or 121 organization that has confirmed the new condition of the part
- One member asked for a requirement that manufacturers be required to issue 8130-3 tags
- One member asked for a step-by-step checklist showing which parts are eligible for 8130-3 under the DAR-56 privileges
  - ASA published a blog post with this information

# Today's Status

Despite FAA efforts to promote use of 8130-3 tags, distributors are still experiencing issues with the tag

- New Inventory
- Existing inventory

# Remedies On Which ASA has Worked with the FAA

- June 24 Manufacturing (PAH 8130-3) Memo
  - Makes it easier for PAHs to issue 8130-3
- June 24 Export Deviation Memo
  - Export and domestic tags now look the same
- Notice 8900.380
  - Permits repair stations to inspect parts without 8130-3, notwithstanding MAG
  - Expires August 26, 2017, but could be incorporated into MAG 7
- DAR 56
  - Limited only to
    - Parts with Part 45 markings (PMA, TSOA, critical), and
    - Parts with PAH certificate of conformity
  - Expires Sept 30, 2017

# New Inventory: 8130-3 Tags

- FAA MIDOs have been asking manufacturers to issue 8130-3 tags under 14 C.F.R. 21.137(o) privileges
- ASA members have encountered manufacturers that refuse to issue 8130-3 tags
- This means that more new parts are coming into the market without 8130-3 tags

# New/Existing Inventory: Notice 8900.380

- MAG 6 restricts affected repair stations from accepting and using any PAH part without an 8130-3, EASA Form One or TCCA Form One
- The Notice permits repair stations to accept parts based on an inspection, which can include an inspection of other forms of industry-standard documentation that support a finding of airworthiness (like manufacturer's certificates of conformity or other appropriate documentation)
  - *But the Notice expires August 26, 2017*

# Existing Inventory: DAR Function Code 56

- Limited-use DAR privileges for employees of AC 00-56 accredited distributors
- Only applies to parts received by the distributor before November 1, 2016, and that bear certain forms of evidence of production by an FAA-PAH
- *All Limited Function Code 56 appointments under this program will be terminated on September 30, 2017*

# Insufficient DARs

- The number of DARs who are operating independently and are available as consultant DARs for distributors appears to be dwindling
- This makes it increasingly difficult to obtain any sort of 8130-3 tag for inventory that was released without such tags

# What are we seeking?

- DAR 56 be expanded to include parts bearing standard forms of indicia of airworthiness (including documentation from certificated air carriers indicating that the parts are in new surplus condition, as well as documentation described in FAA AC 20-62E);
- DAR 56 be extended (aircraft parts are still being manufactured and released without 8130-3 tags, air carriers are still selling new surplus inventories without 8130-3 tags, and there are too many parts to tag them all in a single year);
- Remove the program element that limits Function Code 56 to only parts received before November 1, 2016 (the airworthiness of the parts is not affected by the “received-on” date)

# How can you help?

- Contact FAA HQ and let them know that MAG 6 continues to adversely affect aviation safety by restricting your business from selling airworthy parts (send a copy of your communications to ASA)
  - Tim Shaver, AFS 300 -- 202-267-1704
    - Manager, Aircraft Maintenance Division
    - FAA Flight Standards Service
    - 450 L'Enfant Plaza SW, 5th Floor
    - Washington, DC 20024
  - Susan Cabler, AIR 100 -- 202-267-1575
    - Manager, Design Manufacturing, & Airworthiness Division
    - FAA Aircraft Certification Service
    - 450 L'Enfant Plaza SW, 5th Floor
    - Washington, DC 20024

# How can you help?

- One of our members has announced an intent to lead a Congressional lobbying effort in this area
- We are still gathering information about this effort, but will keep the Association informed through the blog



# Thank You

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