



# GOVERNMENT AND INDUSTRY UPDATES

2017 ASA Annual Conference

Workshop H

# Thank you

- Thank you to Sarbpreet, Tim and Dan for joining us today, and for all that you do during during the year to keep us safe and flying

# ASA Continues to Be Involved in All of the Issues Discussed by the FAA

- And more:
  - Promoting FAA AC 00-56 around the world
  - Managing the ASA-100 program to support aircraft part safety and distribution quality assurance
  - Hazmat shipping policy and training
  - Export compliance policy and training
  - Maintenance policy
  - Certification policy
  - FAA transformations

# ASA Opportunities – Get Involved

- Quality Assurance Committee
- Proposed revisions to ATA Spec 106 (working group within the Quality Assurance Committee)
- Hazmat certification training – live and online (October 11-12)
- Compliance training /regulatory workshop
- FAA Transformation working groups
- Ad hoc government affairs meetings (e.g. meeting in December among ASA members and Dorenda Baker to discuss 8130-3 Tags)
- *Read the blog for more opportunities*

But 8130-3 tags continue to be  
the #1 issue this year for the  
members

*The problem is not getting good parts – the problem is getting the right  
paperwork for otherwise good parts*

# 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**

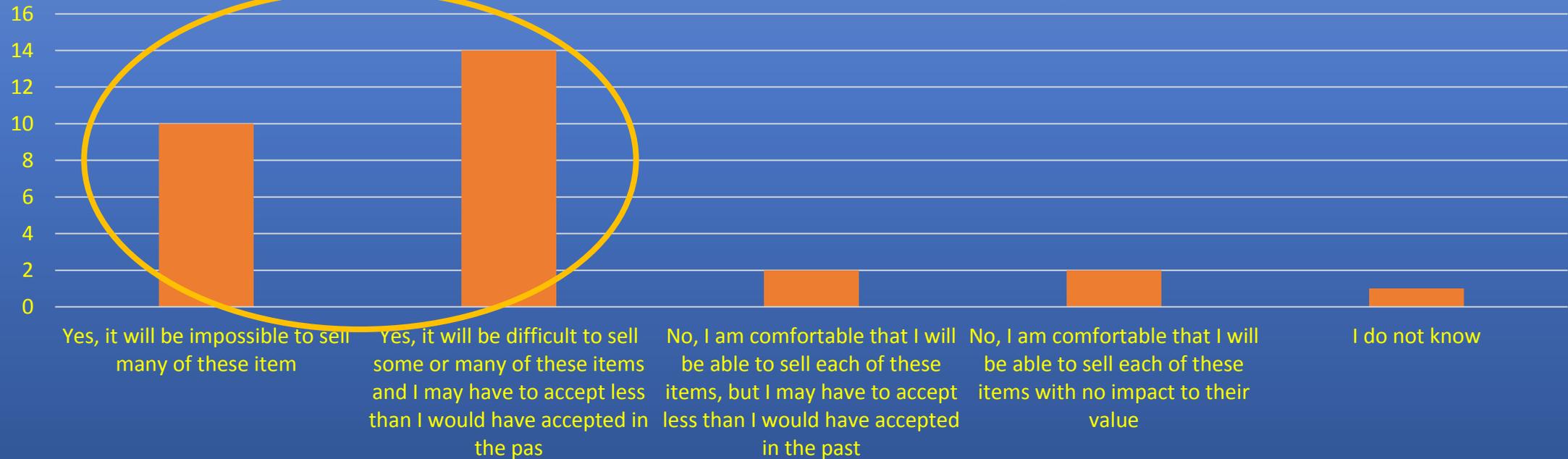
# What Do the Members Say? Trouble Selling Without 8130-3?

- 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)?



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# What Do the Members Say?

## Strategies for Getting 8130-3 tags

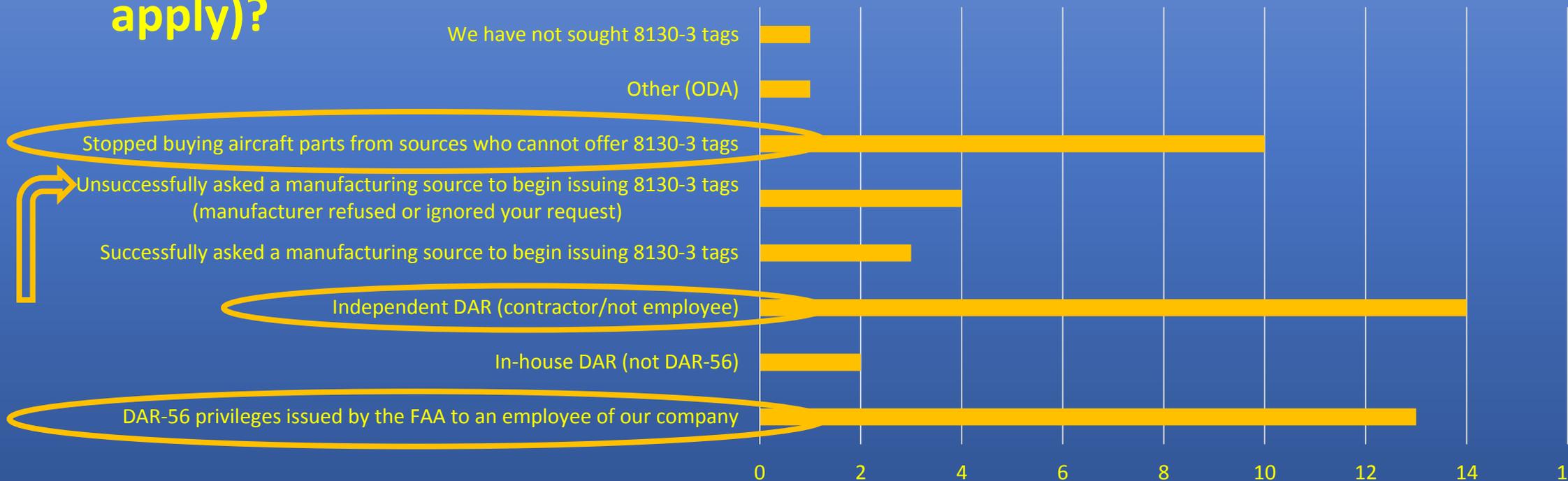
- Which of the following strategies have you used to try to obtain 8130-3 tags for aircraft parts in the past year (please check all that apply)?



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## Strategies for Getting 8130-3 tags

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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
- Members 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

# Other Member Concerns

- 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
- Members report that they are selling parts without 8130-3 to EU-based repair stations, and the same parts are being rejected by US-based repair stations
  - Cause of rejection has been cited as MAG 6

# Today's Status

# Remedies On Which ASA has Partnered 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
  - *Notice expires August 26, 2017*
- DAR FC 56
  - Limited only to Parts received before November 1, 2016, with:
    - Parts with Part 45 markings (PMA, TSOA, critical), and/or
    - Parts with PAH certificate of conformity
  - *Appointments terminated on September 30, 2017*

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

- New Inventory
- Existing inventory

# Going Forward

- EASA was investigating changes to the sorts of parts that need EASA Form One
  - Could permit transactions in other parts, like expendables, without 8130-3
  - EASA rulemaking team may be discontinued (or rule not pursued) for budgetary reasons
- ASA has asked FAA to amend the DAR FC 56 program and 8900.380 in order to provide a bridge to the industry until solutions are implemented

## What we are seeking (*bridging programs*):

- 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?

- Let ASA and the FAA know how MAG 6 is:
  - affecting aviation safety
  - restricting your business from selling airworthy parts
- If you make use of FC 56, then please adhere scrupulously to the terms of the program
  - FC 56 is more narrow than FC 20 and FC 32



# Thank You

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