

Aviation Suppliers Association Accreditation Program (ASAAP)

Letter of Interpretation 100-XXX-Proposed Draft

EFFECTIVE DATE:

DRAFT.

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TERMINATION DATE:

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ISSUE:

Removing the Requirement for First-Tier Standard Parts Distributors to Periodically Verify Conformity

AFFECTED SECTIONS:

ASA-100 § 6(E) (Revision 5.0)

BACKGROUND:

The ASA-100 quality system requires that an accredited distributor meet the requirements of both ASA-100 and the FAA Advisory Circular AC 00-56 (Voluntary Industry Distributor Accreditation Program).

An ASA-100 auditor has requested the removal of section 6(E) from the ASA-100 standards. That subsection's current language states:

- E.** A distributor of new standard parts purchased from a manufacturer, shall maintain an inspection program which includes periodic verification that standard parts meet the technical specifications applicable to the part number. The distributor shall ensure that adequate specifications are available to support the inspection process, and that these specifications are current. The distributor shall maintain a record of inspections used to make this verification

There is no corollary requirement in FAA AC 00-56.

In 1999, ASA published LOI 100-006 to clarify the intent of this clause. The LOI stated that:

"[T]he term "a part that is purchased from a manufacturer" only includes parts that are purchased directly from the company that produced them. This term includes parts purchased from a company that markets parts under its own corporate name even though it may contract-out the actual fabrication to a different company. This term does not include new surplus parts purchased from an air carrier, nor does it include new parts purchased from any other distributor or third-party."

LOI 100-006 also clarified that:

The phrase "a distributor of new standard parts purchased from a manufacturer," shall mean any distributor that engages in a regular pattern and practice of purchasing new standard parts directly from a manufacturer

Thus, section 6(E) of ASA-100 applies only to first-tier distributors of standard parts, and it imposes on them an obligation to perform periodic verification that standard parts meet the applicable technical specifications.

The auditor has expressed concerns that for firms acting as first-tier standard parts distributors, but not having a formal agreement with manufacturer, implementing such a system or subcontracting it, would not be achievable due to lack of support from the manufacturer. A discussion also arose as to whether such activities from a distributor to verify manufacturing output is appropriate.

[Discussion point for the QA Committee – this clause imposes on first-tier distributors of new standard parts an obligation to maintain a program to periodically verify that the parts meet technical specifications. This was considered to reflect an industry standard at the time it was published.

1) Does this practice (periodic verification of standard parts) remain an industry standard practice?

2) Has anything in the industry changed such that periodic verification of standard parts is no longer considered valuable? --]

[Proposed] RESOLUTION:

In order to alleviate a requirement that should not be done by a distributor, ASA-100 § 6(E) shall be deleted from the ASA-100 standard.

This change will be effective as of the effective date of this LOI, and the ASA-100 standard (revision 5.0) shall be considered amended by this LOI as of that date. All ASA-100 accredited distributors must ensure that their systems comply with ASA-100 (as amended by this LOI) by [COMPLIANCE DATE]. Compliance with this LOI shall be permitted beginning on the effective date of this LOI.

Regardless of this LOI, an accredited distributor will be required to follow the written guidance found in its quality manual, as well as the standards to which it is accredited. If this LOI contradicts the accredited distributor's quality manual, ASA-100 or AC 00-56, then the controlling authority is determined in the following order of precedence:

- 1) AC 00-56
- 2) ASA-100 (as amended by this LOI)
- 2) Quality Manual

However, an accredited distributor whose quality manual imposes additional requirements beyond the requirements of this LOI shall be expected to follow both the LOI and the additional requirements found in the distributor's own quality manual.

ANTICIPATED FUTURE ACTION:

This interpretation is offered to amend ASA-100. ASA intends to update the language of ASA-100 to clarify this point in the next revision, at which time ASA-100 § 6(E) shall be deleted from the ASA-100 standard.

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