

Aviation Suppliers Association Accreditation Program (ASAAP)

Letter of Interpretation 100-XXX-Proposed Draft

EFFECTIVE DATE:

DRAFT.

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TERMINATION DATE:

DRAFT.

Until published in final form, it does not represent ASA policy.

ISSUE:

Improving Auditability of Drop Shipments

AFFECTED SECTIONS:

ASA-100 § 11(C) (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).

ASA regularly reviews audit outcomes and based on audit outcomes ASA has noticed that there is an issue with distributors being able to show evidence of compliance to the requirement of 11(C).

ASA-100 subsection 11(C) states:

- C. When a distributor causes an article to be shipped as a drop shipment, the distributor shall review and approve the documentation relating to each article in the drop shipment.

[Discussion points for the ASA Quality Committee:

- 1) Is the current approach to drop shipment seen as a problem by the distributor community? What problems have the distributor community seen with this requirement?***
- 2) Does the proposed solution correct the problem?***
- 3) What are the potential costs of the proposed resolution?***
- 4) What is the potential value of the proposed resolution?***
- 5) The proposed amendment is more prescriptive and less goal-oriented (performance-based), which is contrary to modern regulatory trends; does this potentially exclude some otherwise-acceptable solutions? –]***

[Proposed] RESOLUTION:

In order to provide clear expectations of the ASA-100 requirements, ASA-100 § 11(C) shall be amended to read:

- C.** When a distributor causes an article to be shipped as a drop shipment, the distributor shall review and approve the documentation relating to each article in the drop shipment. To implement this requirement, the distributor shall:
- 1) have a system documented in its quality manual that explains how the review and approval takes place; and
 - 2) document the accomplishment of this procedure.

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 § 11(C) shall be amended consistent with this interpretation.

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