

Aviation Suppliers Association Accreditation Program (ASAAP)

Letter of Interpretation 100-XXX-Proposed Draft

EFFECTIVE DATE: DRAFT. *This is a draft document circulated for ASA Quality Committee review and consideration only. Please do not distribute it.*

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ISSUE: Amending the unapproved parts requirements to require a process for checking appropriate unapproved parts resources.

AFFECTED SECTIONS: ASA-100 § 8(J) (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).

The current version of the ASA-100 standard advises reporting of unapproved parts to the FAA or to the local CAA.

The current version of ASA-100 section 8(J) states:

J. The distributor should report suspected unapproved parts to the FAA according to AC 21-29 or to the appropriate CAA.

The Association proposes to support this reporting recommendation by requiring the distributor to have a process for checking unapproved parts information to better identify parts that have been identified as suspect or as unapproved by applicable aviation authorities. The proposal would add a process for identifying the relevant notices that must be checked, and then checking them against the then-current inventory and also checking them against received articles to better identify the suspect articles. This would be accomplished through the following language:

J. The distributor shall have an unapproved parts system that features at least the following elements:

(1) the distributor shall identify at least one jurisdiction that is relevant to the articles sold by the distributor (for example, a U.S.-based distributor selling articles produced by a U.S. production approval holder to U.S.-based customers would likely identify the United States as the relevant jurisdiction);

(2) from each jurisdiction listed in subsection (1), the distributor shall identify at least one type of government notice that is relevant to the approval status of articles sold by the distributor (for example, in the United States the distributor would likely identify the FAA unapproved parts notices);

(3) the distributor shall have a process for reviewing the government notices described in subsection (2) within a reasonable time after they are issued and (a) checking whether the distributor has shipped the articles described in the notice within the past year to any customer, and (b) checking whether the articles described in the notice are within the distributor's then-current inventory and (c) ensuring that such parts are identified in receiving inspection if they are subsequently received by the distributor;

(4) the distributor shall have a process for safe disposition of articles described in a government notice described in subsection (2), including features such as quarantine of affected articles in the distributors control (pending final disposition), scrapping of articles known to be unairworthy, and/or notification of affected customers;

(5) the distributor should report suspected unapproved parts to the civil aviation authority with jurisdiction over the transaction (jurisdiction to be selected at the reasonable discretion of the distributor). If reporting to the FAA, then report in accordance with FAA AC 21-29. If reporting to EASA, then report in accordance with EASA SIB 2017-13R1.

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 shall 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 § 8(J) shall be amended in the ASA-100 standard.

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