



# ASA Quality Committee

ASA/AFRA Annual Conference

June 23, 2024

# Agenda



9:00 am	Welcome; Antitrust Statement	Knights, J Dickstein
9:05 am	Participant Introductions	Committee
9:15 am	ASA Announcements	M Dickstein
9:25 am	ASA-100 and ASACB Program Update <ul style="list-style-type: none"> <li>• ASA Support of TAC 2000 Companies</li> <li>• AQMS Standards</li> </ul>	O'Connor
9:55 am	AS9100 and SCMHS Changes	O'Connor
10:10 am	SWOT Analysis Subcommittee	O'Connor
10:20 am	BREAK	
10:50 am	AOG Technics Update	J Dickstein
11:00 am	FAA (Flight Standards) Updates on AC 00-56 and other Policy Issues	Hiles
11:30 am	FAA (Aircraft Certification) Updates on SMS and other Policy Issues	Tiernan
12:00 noon	LUNCH	

12:00 noon	LUNCH	
1:00 pm	Most Prevalent ASA-100 Audit Findings	O'Connor
1:15 pm	Form an AC 00-56C subcommittee to identify Possible changes to AC 00-56B	Wolf
1:30 pm	Export Compliance Update	J Dickstein
2:00 pm	Mischaracterizations about ASA and AC 00-56	M Dickstein
2:15 pm	Identifying and Combatting Fraud	Knights
2:30 pm	Forming a Subcommittee on LLP Documentation Standardization	Chaput
2:45 pm	New Business and Open Discussion	Committee
3:00 pm	ADJOURN	



# ASA Announcements

Michele Dickstein



# ASA-100 and ASACB Program Update

Sam O'Connor



# Certification by Country

Australia - 5	Canada – 8 (5)	Chile – 1	China/Hong Kong – 77 (52)	Denmark – 4 (1)	Estonia - 1	France – 6 (1)
Germany – 6 (2)	Indonesia - 1	Iraq – 0 (-1)	Ireland – 7 (1)	Israel – 2	Jordan – 5 (2)	Lithuania – 1 (-2)
Luxembourg - 1	Malaysia – 1	Netherlands – 7 (2)	Nigeria – 1	Panama – 2 (1)	Poland – 1	Singapore – 25 (5)
South Africa – 4 (3)	Sweden – 1	Switzerland – 3 (-1)	Thailand – 2 (2)	Turkey – 2 (1)	U.A.E – 11 (1)	U.K. – 49 (20)
U.S. – 454 (70)						

**Certification total worldwide – 688**

**New Certifications since 2023 Conference - 124**



# TAC-2000 Timeline

## Quarter 4 2023

- ASA begins to receive multiple inquiries from TAC 2000 accredited organizations asking about the process to become ASA-100.
- A client of Transonic Aviation owners of TAC-2000 informs ASA that TAC 2000 will be ceasing operations. ASA was not formally informed by Transonic Aviation of this decision.
- ASA was contacted by Transonic Aviation management requesting assistance in auditing several of their clients to their standard.

## Quarter 1 2024

- ASA informs its board of directors of the developments relating to TAC-2000 and the action plan put together by ASA's management team.
- ASA reaches out to members of the association who hold TAC-2000 accreditation and prioritize them for available audit dates to transition to ASA-100.
- ASA creates a webinar on the process to become ASA-100 accredited for TAC-2000 organizations. This webinar addresses ASA-100 requirements and expectations. It also contains areas of concern/weakness based on reviews of supplied quality manuals from several TAC-2000 accredited organizations to ASA-100 and AC 00-56 requirements.

# TAC-2000 Timeline Continued



## Quarter 1 2024

- “On January 29, 2024, Transonic notified the FAA they were terminating their participation in Voluntary Industry Distributor Accreditation Program.
- ASA begins scheduling TAC-2000 accredited organizations for ASA-100 initial accreditation audits.
- ASA reaches out to assigned auditors and goes over a PowerPoint presentation explaining process to transition TAC-2000 organizations to ASA-100. This same presentation provides an overview of areas of concern and weakness identified from review of submitted quality manuals from TAC-2000 accredited organizations. Transonic Aviation from what we could uncover never created/issued a TAC-2000 standard and listed all the requirements in their quality manual template.
- By February 14, 2024, ten TAC-2000 accredited organizations were scheduled for initial accreditation ASA-100 audits.

# TAC-2000 Timeline Continued



## Quarter 2, 2024

- FAA Information for Operators (InFO) 24004 (April 23, 2024). This is formal notification of TAC-2000 removal from FAA Voluntary Industry Distributor Accreditation Program.
- FAA defines what this means for Distributor's and how TAC-2000 expiration dates will be handled.
- TAC-2000 accreditations will expire on January 24, 2025, even if the expected expiration date is after January 24, 2025.
- FAA directs ASA as the accreditation database manager to notify them if we receive a new request to add a TAC-2000 accredited distributor to the program's database with an accreditation date after January 23, 2024. The FAA will review on a case-by-case basis if they may be added to the database.
- As of June 14, 2024, a total of 30 TAC-2000 organizations have completed an initial accreditation to ASA-100. 10 of the 30 organizations have also become members of the association.
- A total of 29 additional TAC-2000 organizations have applied for ASA-100 accreditation pending scheduling/performance of an audit.



# ASA-100 Audit Statistics

	2022	2023	2024 thru 6/12/2024
Number of Audits by Unique Tracking ID	460	520	362
Number of Audits with Findings	257	329	217
Number of NCRs Written	959	913	1274
% Audits with Findings	56%	63%	60%
Avg NCRs / Audit	2.1	2.8	3.51%
Avg NCRs per Initial Audit (201's)			5.05

## TAKEAWAY:

As of June 12, 2024, there are 737 Audits forecasted for 2024

As of June 12, 2024, more NCRs have been generated as issued in all of 2023



# ASACB UPDATE



# EXPANSION OF ACCREDITED PROGRAMS

The applications for expansion of ASACB's accreditation with ANSI National Accreditation Board (ANAB) were filed on May 31, 2023, for the following.

- ISO 27001 – Information Security Management Systems

ASACB has hired three ISO 27001 lead auditors with experience auditing ISMS and relevant industry experience of 30 years or more.

ANAB successfully completed an initial certification witness audit of ASACB's process and auditor on 2/28/2024 Stage 1 and 3/26-28/2024 Stage 2 with zero NCRs issued.

ANAB successfully completed oversight office audit on June 10, 2024, with zero NCRs issued.

ANAB office lead auditor has made the recommendation to grant accreditation to ISO 27001 pending final approval from the ANAB review board.



# EXPANSION OF ACCREDITED PROGRAMS

The applications for expansion of ASACB's accreditation with ANSI National Accreditation Board (ANAB) were filed on May 31, 2023, for the following.

- ISO 14001 – Environmental Management Systems

ASACB placed this expansion on hold to complete the expansion of accreditation for ISO 27001. The amount of effort to expand two accreditations at the same time was more than existing resources could manage.

Efforts will resume after the end of the annual conference now that the expansion for ISO 27001 has been achieved pending approval from ANAB.

ASACB is in the process of interviewing potential EMS lead auditors.



# QMS CERTIFICATION BY STANDARD

ISO 9001	AS9100	AS9110	AS9120	TOTAL
29	90	29	88	236 (250)

# QMS CERTIFIED LOCATIONS

ISO 9001	AS9100	AS9110	AS9120	TOTAL
43	144	61	147	395



# QMS CERTIFICATION BY COUNTRY

<b>U.S. - 175</b>	<b>Dubai - 6</b>	<b>U.K. - 22</b>	<b>Netherlands - 2</b>	<b>China - 4</b>	<b>Turkey - 1</b>
Denmark - 3	Germany - 2	Ireland - 5	Jordan - 3	Singapore - 2	Switzerland - 2
France - 2	Hong Kong - 1	Serbia - 1	Malaysia - 1	Spain - 1	Canada - 2
Czech Rep. - 1					



# ASACB Growth



ASACB Currently Audit Days at 731 for 2024 without transfers, new clients, special or TBD audits etc.



**Questions?  
and  
Thank You!  
Sam O'Connor  
sam@aviationsuppliers.org**



# AS9100 and SCM/H



# ISO 9001:2015 action of Climate Change to Management System Standards by ISO

On March 4, 2024, ANSI National Accreditation Board issued Heads Up 527 regarding the following matter.

Addition of Climate Change to the Management Systems Standards by ISO. The Climate Action Amendments to ISO Management Systems Standards (MSS) is complete and amendments to the standards were published on 23 February 2024.

The IAF/ISO Joint Communique released the following excerpt on the basis for the IAF's final Decision:

*“The overall intent of the requirements for clauses 4.1 and 4.2 remain unchanged; these clauses already include the need for the organization to consider all internal and external issues that can impact the effectiveness of their management system; these new inclusions are assuring that Climate Change is considered within the management system and that it is an external factor that is important enough for our community to require organizations to consider it now.”*

Certified organizations need to consider if Climate Change is a relevant issue within their own management system(s). If so, as with other relevant issues, the organization must consider it within their system's objectives and risk evaluation, within the scope of their management system(s).



# REVISION TO AS9120

The AS9120 rewrite team had,

- met every six weeks beginning in August 2022.
- Removed all specific flow down requirements from AS9100 and made more distribution centric.
- has completed the draft and completed the final review.
- has submitted the draft in the next review phase of a coordination draft to the IAQG for review and comment before its release.

The release timeline of the new revision has been updated to occur in the first quarter – second quarter of 2025. This is a direct result of waiting on the ISO 9001 update. The IAQG did not want to perform to releases so closely together.



# AS9120 Summary of Changes

Intended App.: 2	Section 3.3: 1	Section 3.4: 2	Section 3.5: 5	Section 4.3: 1	Section 5.1.2.d: 1	Section 5.3: 1	Section 7.1.5: 1
Section 7.1.1: 1	Section 7.3: 1	Section 7.5.3: 1	Section 8.1.a: 1	Section 8.1.2: 1	Section 8.1.4/8.1.5: 1	Section 8.2.3.1.f: 1	Section 8.4.1: 1
Section 8.4.2: 1	Section 8.4.3: 1	Section 8.5.1: 1	Section 8.5.1.1: 1	Section 8.5.3: 1	Section 8.5.4: 2	Section 8.5.6: 1	Section 8.6: 2
Section 8.7: 1				Annex A5: 1			



**Questions?  
and  
Thank You!  
Sam O'Connor  
sam@aviationsuppliers.org**



# IAQG Supply Chain Management Handbook



**The IAQG develops and deploys guidance materials and tools to address continual improvement of product conformity and on-time delivery performance throughout the entire value stream. The supply Chain Management Handbook (SCMH) is intended to assist organizations with the understanding of IAQG member requirements and how to apply them. The SCMH is developed by the IAQG subject matter experts and is continuously updated as changes and improvements are identified.**

Access to the SCMH can be found at by typing the following address in your web-browser:

<https://scmh.iaqg.org>

The Supply Chain Management Handbook (SCMH) provides guidance materials to continuously improve On Quality Delivery and On Time Delivery throughout the entire value stream. Its objective is to help the supply chain improve their quality performance through a better understanding of aviation, space and defense industry quality management system requirements and expectations.

# Supply Chain Process Life Cycle



## SCMH Guidance Topics

[PLAN & MANAGE](#)[DESIGN & DEVELOP](#)[MAKE](#)[BUY](#)[DELIVER](#)[CUSTOMER SUPPORT](#)

### Buy

Selection, contracting and monitoring of suppliers and sub-tiers to ensure purchased products and services meet final customer requirements and suppliers continually raise their performance levels.

[Contact SCMh](#)

- + [SCMH 4.1 Supplier Capability Assessment \(SCA\)](#)
- + [SCMH 4.3 Supplier Quality Management Basics \(SQMB\)](#)
- + [SCMH 4.4 Sub-tier Supplier Control](#)
- + [SCMH 4.6 Supplier Management \(Buy\) Key Performance Indicator Detailed Definitions](#)
- + [SCMH 4.7 Procurement Engagement](#)

*Available guidance is not inclusive of all aspects of the description, the guidance topics are developed as priorities come forward. If you wish to provide input, please [take the survey](#). Question six is be used to let the SCMh team know what is a priority to you.*





## – SCMH 4.3 Supplier Quality Management Basics (SQMB)

This guidance describes the elements for a basic Supplier Quality Management System (SQMS) for managing a supplier's performance and product conformity. It is applicable to any company in the supply chain with an emphasis on companies who may not have a complete SQMS in place or a new company to the aviation, space and defense supply chain. It contains basic elements that should be utilized (as applicable to the type of business) to ensure product conformity of materials and/or services received from their suppliers.

Most regulatory agencies and Buyers of products or services in the aviation, space and defense industry, have requirements that an organization they do business with has a Supplier Quality Management System (SQMS) that includes documented processes and procedures for managing their suppliers. Some of the basic elements for an SQMS should include but not be limited to processes to address:

- Flowdown of quality requirements
- Supplier Pre-production Planning
- Production Readiness
- Purchased Product Verification
- Supplier Performance Monitoring
- Supplier Surveillance

The guidance material is written from the perspective of a customer or purchasing organization, referred to as the "Buyer".



### Core Guidance



SCMH 4.3.2 Supplier Quality Management Basics Rev C Dated 7MAR2018



### Toolbox



SCMH 4.3.3 Quality System Effectiveness Assessment SQMB Dated 07MAR2018

There are modules related to Supplier Quality Management Basics in the [Aerospace Improvement Maturity Model \(AIMM\)](#). AIMM can help to evaluate the maturity of your QMS in managing this topic in relation to the requirements of the IAQG 9100 Standard. See AIMM modules [8.4.1 Control of Externally Provided Processes, Products, and Services – General](#), [8.4.2 Type and Extent of Control of Externally Provided Processes, Products, and Services](#), and [8.4.3 Information for External Providers](#)



**Questions?  
and  
Thank You!  
Sam O'Connor  
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# SWOT Analysis Subcommittee

During the ASA Quality Committee Winter Meeting held in 2023 a SWOT Analysis was presented and reviewed as a direct result of the AOG Technic Fraudulent Documentation Issue.



Strengths	Weaknesses
<ul style="list-style-type: none"> <li>▪ FAA AC 00-56 self-accreditation program requiring               <ul style="list-style-type: none"> <li>▪ Receiving inspection for confirmation of articles and documentation per appendix 1, Documentation Matrix</li> <li>▪ Training of personnel</li> <li>▪ Administrative processes that identifies and records qualifications of employees authorized to make quality determination</li> <li>▪ Nonconforming material process, segregation, and resolving of the issue to prevent a sale or transfer prior to appropriate disposition</li> <li>▪ A process to establish accountability in the event of duplicate approval tags or other traceable documents</li> <li>▪ Process for controlling the creation of document copies</li> <li>▪ Process for maintaining documentation</li> <li>▪ Process for training of purchasing and receiving personnel about the identification of counterfeit parts and suspected unapproved parts</li> </ul> </li> <li>▪ ASA-100 accreditation program inclusive of the AC requirements with the additional requirements of               <ul style="list-style-type: none"> <li>▪ Supplier approval process</li> <li>▪ Flow down requirements to the accredited organizations supply chain that includes Distributors/Suppliers/OEMs of purchased items</li> <li>▪ Expansion of counterfeit parts and suspected unapproved parts to include personnel involved in material control</li> </ul> </li> <li>▪ ASA's core auditor group has over 25 years industry experience to identify potential issues with articles and related documentation</li> <li>▪ ASA issues member alerts on matters relating to counterfeit parts, suspected unapproved parts and/or fraudulent activities.</li> <li>▪ Communications amongst member companies to bring awareness and corroborate issues both in and out of association functions</li> </ul>	<ul style="list-style-type: none"> <li>▪ ASA-100 audit is a snapshot in time and limited to the samples checked during an audit.</li> <li>▪ Industry will never be able to prevent a participant in the distribution industry from intentionally create fraudulent documentation</li> <li>▪ ASA's lobbying efforts</li> <li>▪ An organizations self-audits don't dive deep into the process of prevention and/or identification of fraudulent documentation</li> <li>▪ The AC allows numerous paths to become listed on the self-accredited database which may not be equal in deployment and maintenance to ensure conformance to the AC requirements</li> <li>▪ Lack of industry understanding of the differences in the above-mentioned paths to self-accreditation</li> <li>▪ Processes required for controlling creation of document copies lack clear guidance and best practices from current CAA AC and Orders</li> <li>▪ Requirements for original Airworthiness documents vs copies vs "certified true copies" or split tags vary by distributor and are not clarified by CAA</li> <li>▪ No requirements for new article documentation under US laws</li> <li>▪ No requirements for documents to remain with parts until installation on assembly</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>▪ Revise ASA-100 standard for recurrent training of counterfeit parts &amp; suspected unapproved parts</li> <li>▪ Increase training on the topic of documentation at defined intervals throughout each year via webinar, in-person workshops and/or ASA's LMS platform</li> <li>▪ Create more specific documentation training relevant to purchasing and inspection personnel</li> <li>▪ Create a database that has sanitized examples of fraudulent documentation which may be used as a training tool for members and accredited organizations</li> <li>▪ Promote the movement from paper documents to a digital format with CAA and Industry acceptance and/or mandates for transition</li> <li>▪ Work with CAA to potentially update applicable AC's and orders</li> <li>▪ Promote best practices for supplier vetting and approval processes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Negative publicity of the aviation supply chain by the media when issues such as AOG arise</li> <li>▪ Perception that the distribution of aviation articles may not be regulated</li> <li>▪ Potential of new Government imposed regulations based on incomplete facts</li> <li>▪ Rush to judgement on making changes to ASA-100 which may not be needed</li> <li>▪ New unaccredited distribution organizations entering the industry with no experience or quality system</li> <li>▪ Lack of industry understanding of the difference in the above-mentioned paths to self-accreditation</li> <li>▪ Increased potential for counterfeit parts manufactured in Russia via non-sanctioning countries</li> </ul>



As a result of the SWOT Analysis the QC Executive Team including Senior Leadership of ASA decided to create two Subcommittees.

- The first subcommittee is tasked with reviewing and making recommended updates to the FAA for the AC 00-56. This is being led by Ron Wolf of AERSALE, Dave Damron of Turbo Resources and QC Executive Team.
  - Supported by ASA management personnel.
- The second subcommittee is tasked with focusing on LLP Documentation Standardization. This is being led by Sherry Chaput of Avion Trace.
  - Supported by ASA management personnel.

A review of ASA-100 will also be completed to see if there is anything which needs to be clarified or added that would strengthen requirements relating to product documentation review/inspection to ensure issues seen with the AOG Technics matter do not continue to plague our industry.

If you are interested in participating in either of these Subcommittee's, please reach out to Michele Dickstein at [michele@aviationsuppliers.org](mailto:michele@aviationsuppliers.org) or Sam O'Connor at [sam@aviationsuppliers.org](mailto:sam@aviationsuppliers.org).



**Questions?  
and  
Thank You!  
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sam@aviationsuppliers.org**



Break 10:20 – 10:50



# AOG Technics Update

Jason Dickstein



# AOG Technics Update

- Last summer, EASA UK CAA and FAA issued notices about AOG Technics
- AOG Technics was accused of issuing inaccurate documentation with aircraft parts
- On 6 December 6, 2023, the UK Serious Fraud Office searched a site associated with AOG Technics in Greater London and made one arrest
- **Nick Ephgrave QPM, Director of the Serious Fraud Office, said:**
  - “This investigation deals with very serious allegations of fraud involving the supply of aircraft parts, the consequences of which are potentially far reaching.*
  - “The SFO is best placed to take this investigation forward vigorously and we are determined to establish the facts as swiftly as possible.”*



# ASA's Response

- Short Term
  - ASA published links to receiving inspection and parts identification training materials to all members, last summer
- Medium Term
  - ASA provided additional training on aircraft parts issues in late 2023
  - ASA worked with FAA on an audit of the ASA-100 program as part of ASA's ongoing effort to improve the program
- Longer Term
  - ASA continues to work on related issues like:
    - Clarity in documentation standards
    - Digital documentation
    - Training
    - Compliance



# FAA AC 00-56B

- FAA has issued change one to AC 00-56B
- Most significant change is removal of the list of FAA-Acceptable Organizations and Their Quality System Standards
  - Placed online instead:

Quality System Standards Organization	Acceptable Quality System Standard	Title	Accreditation Organization
Aviation Suppliers Association (ASA)	ASA-100	Quality System Standard	List maintained by ASA <a href="http://www.aviationsuppliers.org">www.aviationsuppliers.org</a>
International Organization for Standardization (ISO)	ISO-9001	Quality Management Systems Requirements	Certification bodies accredited by International Accreditation Forum (IAF) accreditation body signatories ( <a href="http://www.iaf.nu">www.iaf.nu</a> )
International Aerospace Quality Group (IAQG)	AS9100, AS9110 and AS9120 (EN9100, EN9110 and EN9120)	Quality Management Systems	List of organizations (certification bodies) is maintained on IAQG Online Aerospace Supplier Information (OASIS) database website ( <a href="https://iaqg.org/tools/oasis-v3/">https://iaqg.org/tools/oasis-v3/</a> )



# FAA Order 8130.21J

- Current revision of the 8130-3 tag instructions is 8130.21H
- FAA has been working on 8130.21J
  - Limited to left side signatures (right side addressed in AC 43-9)
  - Shorter, with redundancies eliminated
  - Splitting shipment guidance
    - Clarifies that anyone can split bulk shipments
    - When splitting bulk shipments, 8130.21J is expected to add additional information for the splitter to provide, including the name and contact information for the person doing the splitting (ASA 2020 Statement Form might be useful for this)



# FAA AC 00-56B Update and Other Flight Standards Priorities

Jay Hiles

# ASA Quality Committee Meeting

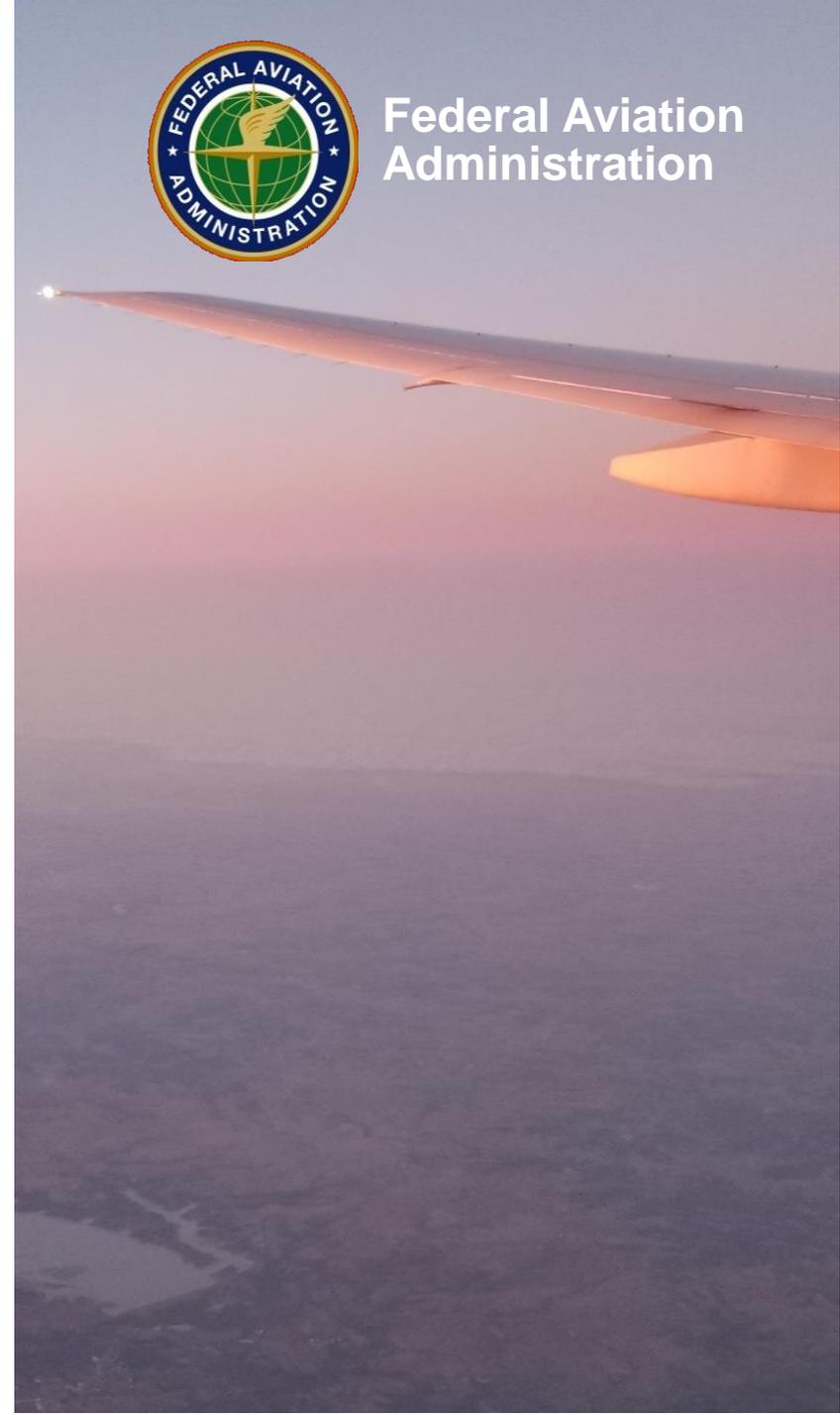
**Jay Hiles**

**FAA Flight Standards  
Aircraft Maintenance  
Division (AMD) AFS-300**

June 23, 2024



Federal Aviation  
Administration



# Objectives

1. What is FAA AC 00-56B & Change 1
2. Discuss changes and revision to AC 00-56B
3. Share a recent removal from the Accreditation Program
4. Discuss AC 00-56 FAA Audit Observations
5. Briefly discuss DARs and Function Codes

 **Advisory Circular**

Subject: Voluntary Industry Distributor Accreditation Program      Date: 4/26/24      AC No: 00-56B  
Initiated by: AFS-300      Change: 1

1. **PURPOSE OF THIS ADVISORY CIRCULAR (AC).** This AC describes a system for accrediting civil aircraft parts distributors based on voluntary industry oversight. The AC also provides information for developing accreditation programs. We, the Federal Aviation Administration (FAA), strongly endorse participation in such a program to help certificated persons establish the eligibility of parts and products for installation on U.S. type-certificated products. We have revised this AC to meet current changes in regulatory requirements and industry practices since original publication. This AC is not mandatory and does not constitute a regulation. Any mandatory language used in this AC applies only to those who choose to voluntarily participate in this program; those who do choose to participate must follow the processes and procedures described in this AC in their entirety to be considered compliant with this program. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, and the document is intended only to provide information to the public regarding existing requirements under the law or agency policies.

2. **PRINCIPAL CHANGES.** This change removes Table 1, FAA-Acceptable Organizations and Their Quality System Standards. This information is now found on the FAA website at <https://www.faa.gov/aircraft/safety/programs/AC00-56>.

**PAGE CONTROL CHART**

Remove Pages	Dated	Insert Pages	Dated
Pages 1 thru 4	5/27/15	Pages 1 thru 4	4/26/24
Pages 6 thru 10	5/27/15	Pages 6 thru 10	4/26/24

  
Robert Ruiz for  
Lawrence Fields  
Executive Director, Flight Standards Service



# What is an FAA Advisory Circular ?

- **Advisory Circulars (ACs) provide a single, uniform, agency-wide system that the FAA uses to deliver advisory (non-regulatory) material to the aviation community.**



# Why Use an Advisory Circular?

Several reasons actually

- Provides an acceptable, clearly understood method for complying with a regulation
- To standardize implementation of a regulation or harmonizes implementation for the international aviation community
- Assists with resolving a general misunderstanding of a regulation
- Assists with requests from other government entities, such as Congress, the General Accounting Office, NTSB, other CAAs, or the Office of the Inspector General
- Aids the industry and FAA to effectively implement a regulation
- Expand on standards needed to promote aviation safety



# Specifics on Advisory Circular (AC- 00-56)

- This AC describes a system for accrediting civil aircraft Parts Distributors based on voluntary industry oversight. The AC also provides information for developing accreditation programs.
- We, the (FAA), strongly endorse participation in such a program to help certificated persons and entities establish the eligibility and airworthiness of parts and products for installation on U.S. type-certificated products.



# AC 00-56 B



U.S. Department  
of Transportation  
Federal Aviation  
Administration

## Advisory Circular

Subject: Voluntary Industry Distributor  
Accreditation Program

Date: 4/26/24

AC No: 00-56B

Initiated by: AFS-300 Change: 1

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Robert Ruiz for  
Lawrence Fields  
Executive Director, Flight Standards Service



# AC 00-56B Change 1 / Table 1

- **Change1** - removed the list of FAA-acceptable quality system standards and accreditation organizations from the AC, relocating them to an FAA website.

5/27/15

AC 00-56B

TABLE 1. FAA ACCEPTABLE ORGANIZATIONS AND THEIR QUALITY SYSTEM STANDARDS

Quality System Standards Organization	Acceptable Quality System Standard (current revision required)	Title	Accreditation Organization
Aviation Suppliers Association (ASA)	ASA-100	Quality System Standard	List maintained by ASA <a href="http://www.aviationsuppliers.org">www.aviationsuppliers.org</a>
Transonic Aviation Consultants	TAC-2000	Aeronautical Parts Distributor Quality Assurance Standard	List maintained by Transonic Aviation Consultants <a href="http://www.transonicaviation.com">www.transonicaviation.com</a>
International Organization for Standardization (ISO)	ISO-9001	Quality Management Systems Requirements	Certification bodies accredited by International Accreditation Forum (IAF) accreditation body signatories ( <a href="http://www.iaf.nu">www.iaf.nu</a> )
International Aerospace Quality Group (IAQG)	AS9100, AS9110, and AS9120 (EN9100, EN9110, and EN9120)	Quality Management Systems	List of organizations (certification bodies) is maintained on IAQG Online Aerospace Supplier Information System (OASIS) database website ( <a href="http://www.sae.org/?PORTAL_CODE=IAQG">www.sae.org/?PORTAL_CODE=IAQG</a> )

CAUTION: Quality organizations' contact information may change.



# AC 00-56B – Internal Review, Changes, Revisions

- AC 00-56B (Change 1) is currently being reviewed by AFS-300 for potential revisions to:
  - ❑ Further clarify duties and responsibilities of both AIR, and AFS
  - ❑ Clarify FAA expectations for:
    - ❑ Quality System Standards and
    - ❑ Accreditation Organizations when accrediting and auditing parts distributors.



# AC 00-56 Changes/Revisions/Considerations

- Add requirements for Quality System Standards and Accreditation Organizations to be accepted by the FAA and for the removal of acceptance.
- Consider suggestions received from industry stakeholders.
- The list of current FAA-acceptable quality system standards and accreditation organizations is available at:

<https://www.faa.gov/aircraft/safety/programs/AC00-56>



# **Recent Events Surrounding an Accredited Organization's Voluntary Termination from the FAA Accreditation Program**

- **January 17-19, 2024 – In accordance with the AC, the FAA observed an accreditation organization performing audits on two parts distributors.**
- **January 24, 2024 – The FAA provided the accredited organization with an extensive list of noncompliant discrepancies.**
- **The FAA requested root causes and corrective actions and - offered to assist the accredited organization in getting back in compliance with the program requirements.**



# Events Surrounding the Accreditation Organization's Voluntary Termination from the Program

- **January 29, 2024 – Based on the findings of the observation, the accreditation organization notified the FAA they were terminating their participation in the program.**
- **The AMD sought the direction of FAA General Council.**
- **The AMD prepared a letter to the accreditation organization confirming their intent to cease doing business under the authority of AC 00-56B.**



# Events Surrounding the Accreditation Organization's Voluntary Termination from the Program

- January 30, 2024 - The FAA opened a priority project to update AC 00-56B to remove the Accredited Organization, along with the table in the AC and to publish an InFO to notify the public concerning the removal.
- The goal was to publish both together and as soon as possible.



U.S. Department  
of Transportation  
Federal Aviation  
Administration

## InFO

Information for Operators  
InFO 24004  
DATE: 04/23/24  
Flight Standards Service  
Washington, DC

[http://www.faa.gov/other\\_visit/aviation\\_industry/airline\\_operators/airline\\_safety/info/all\\_infos](http://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info/all_infos)

*An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements, with relatively low urgency or impact on safety. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.*

**Subject:** Removal of Transonic Aviation Consultants from Advisory Circular (AC) 00-56B, Voluntary Industry Distributor Accreditation Program.

**Purpose:** This InFO serves to inform the aircraft parts distribution industry of the removal of Transonic Aviation Consultants (Transonic) as an accreditation organization and removal of their quality system standard from the AC.

**Background:** The Federal Aviation Administration (FAA) is required by AC 00-56B to monitor the effectiveness of the program. To ensure success of the participating organizations, the FAA participates in, or conducts periodic assessments of the accreditation organizations, quality system standards, and distributors.



Federal Aviation  
Administration

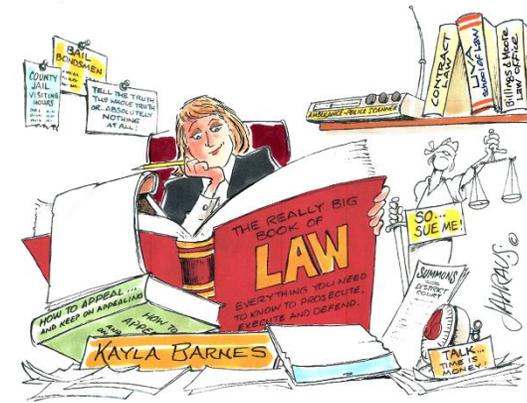
# Events Surrounding an Accreditation Organization's Voluntary Termination from the Program

- **January 30, 2024 - The FAA sent the Accredited Organization a letter sharing the process the FAA would be taking to remove them as an accredited organization.**
- **January 30, 2024 – The AMD notified EASA concerning the accreditation organization's voluntary removal from the program.**



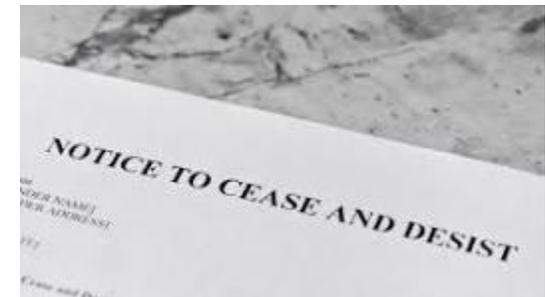
# Events Surrounding the Accreditation Organization's Voluntary Termination from the Program

- January 30, 2024 – The accredited organization emailed the FAA - stating they now wish to keep their accreditation and will remain open.
- January 30, 2024 – The AMD notified the FAA's General Council about the Accredited Organizations intent to remain open.



# Events Surrounding the Accreditation Organization's Voluntary Termination from the Program

- **January 31, 2024 – The AMD sent the accredited organization an email recommending it cease operations effective immediately.**
  - ✓ This was based on the organization not following AC 00-56, along with not wanting to work with the FAA to address the issues. They were also notified a termination letter would be following.
- **January 31, 2024 – The accredited organization then sent an email stating operations would be ceased.**



# Events Surrounding the Accredited Organization's Voluntary Termination from the Program

- February 01, 2024 - The termination letter was emailed to the once accredited organization.



- April 24, 2024 – The once accredited organization was removed from the program in conjunction with the changes associated with **Change 1** to AC 00-56B.



# FAA Audit Expectations / Observations

- **Audit Expectations Moving Forward:**
  - ❑ **Objective 1** is to observe Accreditation Organizations performing audits of distributors to ensure they are in compliance.
  - ❑ **Objective 2** is to learn how the distributor's system functions and operates under AC 00-56.
    - As permitted by AC 00-56, the FAA will ask questions and be involved in the audit to gain understanding of objectives 1 and 2.

- **Audits Performed to Date:**



- ❑ Since December 2023, the FAA has performed 6 individual distributor audit observations to date, involving 4 Accreditation Organization audits. 1 additional observation is planned this coming week, with another scheduled at the end of June.



# FAA Audit Observations



- **Future Considerations:**

- Timing and frequency of FAA audit observations are currently under consideration!**
- 

- **Past Audit Findings:**

- Accreditation Organizations - not performing quality standard audits in conjunction with AC 00-56.**
- Accreditation Organizations - not following their quality manual procedures and not keeping complete records.**
- Accreditation Organizations - performing incomplete audits**



# FAA Audit Observations

- ❑ Distributors not completing the process to be added to the AC 00-56 database listing.
- ❑ Distributors operating outside their quality manual procedures.
- ❑ Distributors failing to train personnel regarding quality manual processes and procedures and AC 00-56.
- ❑ Distributors keeping incomplete traceability documentation for all parts/materials being sold, to include drop-shipping.
- ❑ Distributors failing to perform adequate receiving inspections per its quality procedures.
- ❑ Distributors failing to perform and document self-audits in accordance with its quality procedures.
- ❑ Distributors not performing spot checks of its quality manual for currency and accuracy per its procedures.



# Designated Airworthiness Representative- Manufacturing/Maintenance (DAR-F/DAR-T)

- Active DARs:

- 273** active DAR-Fs with Function Codes 1-8.

- These codes allow the designees authority to issue FAA Form 8130-3s for new domestic and exported engines, propellers, and articles.

- 198** active DAR-Ts with Function Codes 177-180 and 188-191.

- These codes allow the designees authority to issue recurrent/original export and domestic airworthiness approvals for engines, propellers, and articles.

Total - **453 DAR-F's** and **354 DAR-T's**

1. Approving National Aviation Authority Country		2. Form Tracking Number	
UNITED STATES		FAA Form 8130-3, AIRWORTHINESS APPROVAL TAG	
3. Organization Name and Address		4. Work Order/Contract/Invoice Number	
5. Item #	6. Description	7. Part Number	8. Flight(s)
9. Quantity	10. Serial/Part Number	11. State/Work	
12. Remarks			
13. Certifies the items identified above were manufactured in conformity to: <input type="checkbox"/> Approved design data and are in condition for safe operation. <input type="checkbox"/> Non-approved design data specified in Block 12.			
14. Certifies that unless otherwise specified in Block 12 and described in Block 13 no work is performed in accordance with Title 14, Code of Federal Regulations, part 43 and in respect to that work, the items are approved for return to service.		15. Other regulation specified in Block 12 and described in Block 13	
16. Authorized Signature:		17. Approval Authorization No.:	
18. Name (Typed or Printed)		19. Date:	
20. Authorized Signature:		21. Approval Certificate No.:	
22. Name (Typed or Printed)		23. Date Issued:	
User/Installer Responsibilities			
<small>It is important to understand that the existence of this document does not automatically constitute authority to install the part/component/assembly. When the user/installer performs work in accordance with the national regulations of an airworthiness authority different than the airworthiness authority of the country specified in Block 1, it is essential that the user/installer ensures that neither airworthiness approval/part/component/instruction from the airworthiness authority of the country specified in Block 1, nor Statements in Blocks 12 and 13 do not constitute installation certification. In all cases, aircraft maintenance records must contain an installation certification issued in accordance with the national regulations of the user/installer before the aircraft may be flown.</small>			
<small>FAA Form 8130-3 (04-01)      *Installer must ensure check eligibility with applicable technical data.      NIV: 001-00-012-9905</small>			



# Designated Airworthiness Representative- Manufacturing/Maintenance (DAR-F/DAR-T)

- Selection Process for DARs:
  - ❑ The Managing Office/Selecting Official (SO) determines the need and ability to manage the designation and the evaluation by an assigned evaluation panel.
  - ❑ If the FAA determines there is a need, and adequate FAA resources to manage the designee, the SO will initiate a search for qualified applicants in the FAA DMS.
  - ❑ The SO will assign an evaluation panel to review each application selected.



# Thank You for Your Attention

Jay Hiles

[john.j.hiles@faa.gov](mailto:john.j.hiles@faa.gov)



Dean Hamilton

[dean.hamilton@faa.gov](mailto:dean.hamilton@faa.gov)

Robert Bennett

[robert.bennett@faa.gov](mailto:robert.bennett@faa.gov)



Federal Aviation  
Administration



# Safety Management Systems

Thomas Tiernan



Federal Aviation  
Administration

# What Industry needs to know about adopting a Voluntary SMS Program



**Presented to:** 2024 ASA/AFRA Annual Conference (ASA Quality Committee)

**By:** Thomas Tiernan– Aircraft Certification Service, SMS Focal, Federal Aviation Administration

**Date:** June 23, 2024

# Topics

- **SMS Part 5 Rule and Resources**
- **Aircraft Certification Service (AIR) Voluntary SMS (VSMS)**
- **VSMS Program**
- **VSMS Benefits**
- **VSMS Process**



# Safety Management Systems (SMS)

- **SMS final rule (14 CFR part 5) effective May 28, 2024**
  - Applies to certain type certificate and production certificate holders.
  - Does not apply to PMA holders or repair stations.
  - SMS provides a structured, repeatable, and systematic approach to proactively identify hazards and manage safety risk.
- **PMA holders are encouraged to join the Aircraft Certification Service's (AIR) Voluntary SMS (VSMS) program**
  - FAA will review, accept, and provide oversight for those under the AIR VSMS program.
  - FAA will provide an acceptance letter recognizing an accepted VSMS under the AIR VSMS program.
- **Repair stations may join the Flight Standards' voluntary SMS program**



# Safety Management Systems (SMS)

- **Contact FAA at the following address to learn more about the AIR VSMS program:** Email: [9-AVS-AIR-SMS@faa.gov](mailto:9-AVS-AIR-SMS@faa.gov)
- **Materials available to support SMS implementation:**
  - Advisory Circular (AC) 21-58
    - Provides guidance for organizations that are developing and implementing an SMS.
    - AC 21-58 is available on the FAA Dynamic Regulatory System (DRS) ([AC 21-58 - Safety Management Systems for Part 21 Type and Production Certificate Holders \(faa.gov\)](#)).
  - FAA Order 8120.24
    - Provides guidance on how FAA personnel will process those that must have a SMS under part 5, as well as, for a voluntary SMS participant under the AIR VSMS program.
    - Order 8120.24 is available on DRS [Order 8120.24 - Implementation Plan Approval, Verification, and Evaluation of Safety Management Systems for Design and Production Approval Holders \(faa.gov\)](#)



# AIRs Voluntary SMS Program

- **Aircraft Certification Service (AIR) continues to support the FAA's Voluntary SMS Program.**
- **AIR's Voluntary SMS:**
  - Available to all FAA production approval holders.
  - Promoted industry involvement and feedback at early stages prior to rule implementation.
  - Promoted industry adoption of SMS and compliance with the SMS final rule.
  - Supports the **seamless transition** of companies to an SMS that meets part 5 requirements.
  - Aligns with FAA's Flight Standards Service (AFS) – some companies seek a corporate SMS (multiple certificates – part 21 & 145).



# AIR's Voluntary SMS – The Benefits

## 1. It's **voluntary**

- You don't have to adopt it – or you can proceed incrementally, as resources allow.
- You can dig in now, conduct gap analysis, and work toward FAA validation and acceptance.

## 2. It's **scalable**

- Small companies with **limited resources** can adopt a version of SMS that is right-sized for them.
- Larger companies — with more staff and greater resources — can develop a more robust SMS program.

## 3. FAA **staff and resources ready to help**

- AIR's [VSMS webpage](#).
- FAA's SMS Program Office & mailbox ([9-AVS-AIR-SMS@faa.gov](mailto:9-AVS-AIR-SMS@faa.gov))

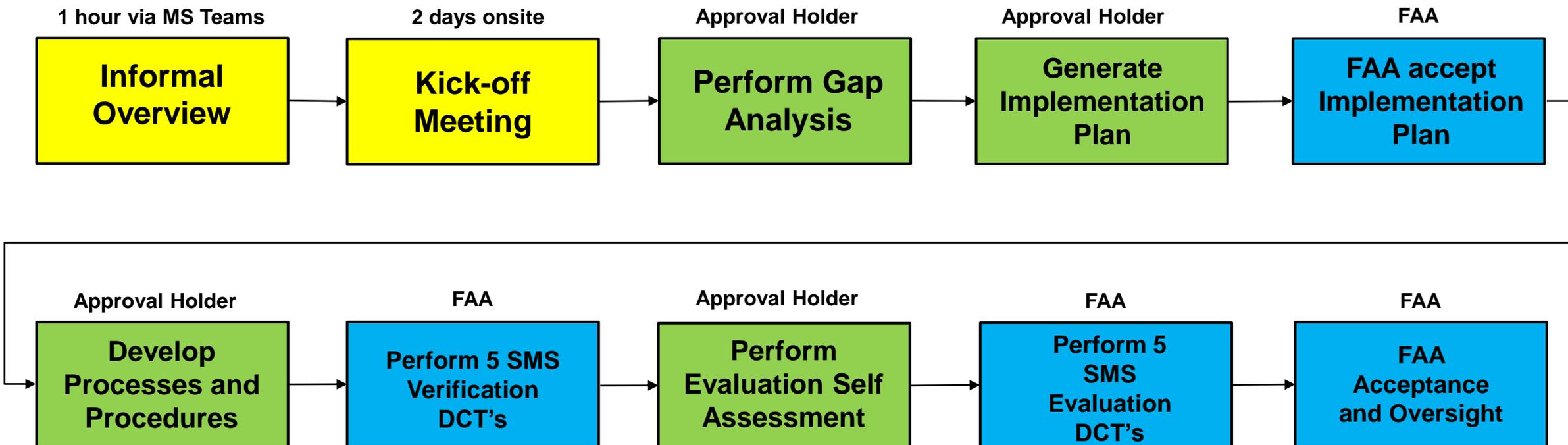
## 4. Receive official **FAA Letter of Acceptance**.

- Companies that successfully complete the SMS evaluation will receive FAA validation of their SMS in the form of an official FAA letter of acceptance (reflecting satisfied intent of 14 CFR part 5 — the SMS rules).
- Such FAA recognition would enable you to show your customers — and potential customers — that your safety management system is on par with the major U.S. airlines and several large OEMs.



# Voluntary SMS – the Process

- Certificate Holder
- FAA: Certification Branch / Certificate Management Sections



# Questions & Feedback

For Questions and support:

- FAA Office of Safety Standards, **SMS Program Office:** [9-FAA-AIR-SMS@faa.gov](mailto:9-FAA-AIR-SMS@faa.gov)





Lunch: Noon - 1:00 pm



# Most Prevalent ASA-100 Findings

Sam O'Connor

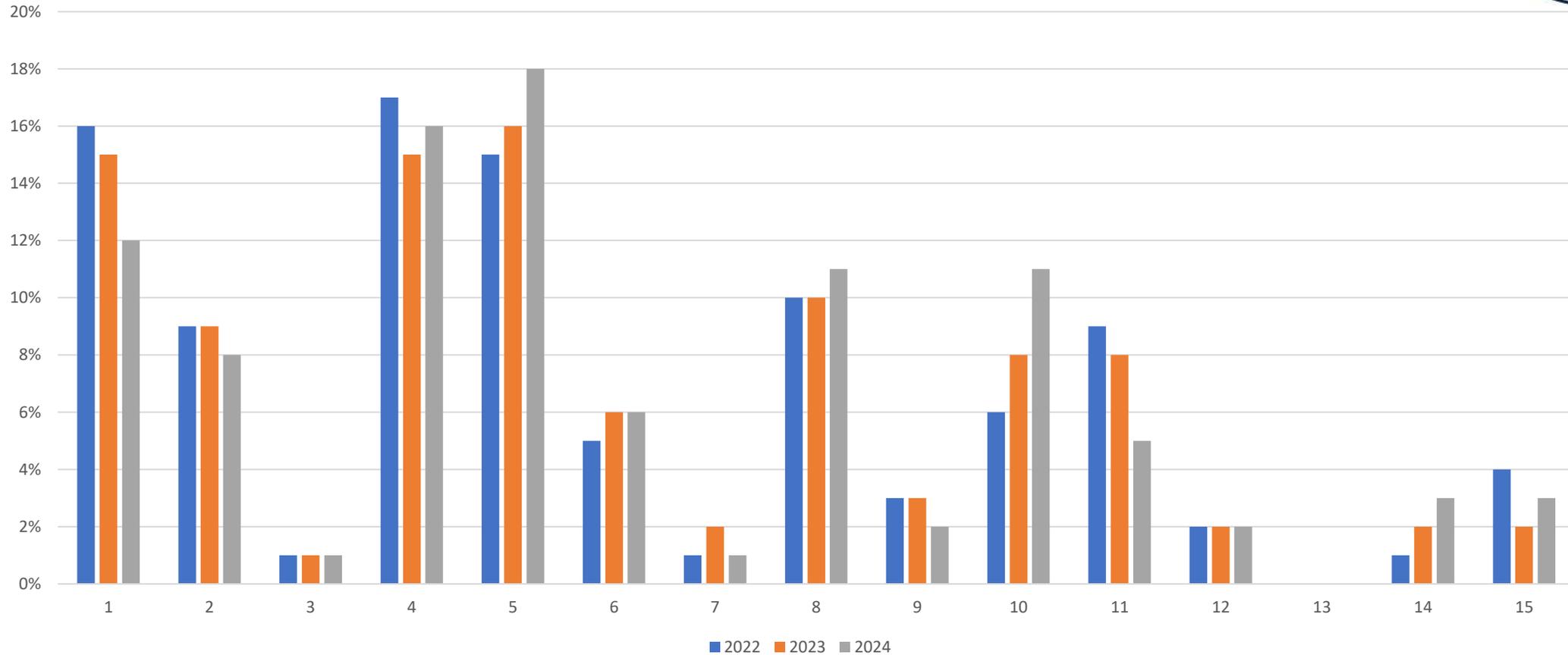
# ASA-100 Audit Statistics

## NCRs by ASA-100 Clause



ASA-100 Clause	2022 # NCRS	2022 % NCRs	2023 # NCRs	2023 % NCRs	2024 # NCRs thru June 12, 2024	2024 % NCRs
1. Quality System and Quality Manual	151	16%	149	15%	116	12%
2. Self-Audit/Evaluation & Accreditation Programs	91	9%	85	9%	77	8%
3. Facilities	10	1%	14	1%	14	1%
4. Training and Authorized Personnel	167	17%	142	15%	160	16%
5. Procurement	143	15%	150	16%	179	18%
6. Receiving Inspection	50	5%	61	6%	61	6%
7. Measuring and Test Equipment	10	1%	17	2%	13	1%
8. Material Control	94	10%	101	10%	104	11%
9. Shelf-Life Control	28	3%	25	3%	23	2%
10. Certification and Release of Materials	59	6%	73	8%	106	11%
11. Shipping	89	9%	81	8%	47	5%
12. Records	18	2%	21	2%	20	2%
13. Technical Data Control	1	0%	3	0%	2	0%
14. Corrective Action Process	8	1%	18	2%	26	3%
15. Hazmat Control and Transport	40	4%	24	2%	27	3%

# NCRs by Clause (2022, 2023, YTD 2024)



# YTD 2024 TOP 5 : NCRs by ASA-100 Element



ASA-100 Clause	2022	2023	2024
1. Quality System and Quality Manual	16%	15%	12%
4. Training and Authorized Personnel	17%	15%	16%
5. Procurement	15%	16%	18%
8. Material Control	10%	10%	11%
10. Certification and Release of Materials	6%	8%	11%

## TAKEAWAY:

- The up tick in issued non-conformances in Procurement, Material Control, and Certification and Release of Materials could be precursors of a shift within our industry on current practices. Additional review of the non-conformances in these areas would need to be performed before any definitive statement could be made by ASA.

# TOP 5 Summary YTD 2024 NCRs by ASA-100 Element



ASA-100 Element	YTD 2024	Types of Findings
1. Quality System and Quality Manual	18	Not all elements Addressed/Not Current
	81	Incorrect Form Revisions/Forms Not referenced in Manual/Manual not Accurate/Current/Revision Control
	11	Distribution of Manual/Documents not readily available/Notify ASA
4. Training and Authorized Personnel	21	Issues with SUP or CFP Training
	36	No Roster or Roster not Current
	64	Missing Training records to show required training was completed
	16	Training Form not completed correctly or missing required information
5. Procurement	63	Issues with ASL
	11	No Quality History or no QAMFORM8
	32	Issues with Trace, or Listed Condition
	65	Issues with T&Cs or Flow down of required NIS
	11	Drop Ship Process
8. Material Control	30	ESD Process
	28	Control of Nonconforming Product (Segregation/Recall/ Log)
	11	Inventory Accuracy and Part ID/Cond Tag – ATA-300 Requirement, Unkempt, Storage
	19	Scrap Records
10. Material Certification	46	True Copy – Either no True Copy Stamp or not Stamping Shipped Documents per Appendix A
	45	10B Statements not on Material Cert
	8	Inaccurate Info on Material Cert or ATA-106



# Subcommittee to Identify Possible Changes to AC 00-56B



# AC 00-56

- AC 00-56 was issued in 1996
  - AC 00-56A was issued in 2002
  - AC 00-56B was issued in 2015
- 
- Periodic updated help to keep the advisory circular relevant and responsive to the evolution of the industry



# What Sort of Changes Can be Made?

- **ADD**

- New substantive standards can be added (e.g. a requirement for hazmat training was added to the “A” revision)
- New procedures can be added (e.g. the B” revision permitted database letters to be sent by electronic means)

- **SUBTRACT**

- Outdated material or material that does not contribute to aviation safety can be eliminated (e.g. FAA has removed accreditation standards that are no longer active)

- **CLARIFY**

- Clarify an unclear requirement (e.g. FAA has clarified issues like audits must be accomplished on-site, and the details of the self-audit)



# Two Main Focus Areas

**Procedural Elements** (e.g. distributor application and AO audit process)

- Is the current process flow for AC 00-56B still appropriate to the industry?
- Are there procedures that are outdated and should be removed?
- Are the auditor standards appropriate?
- Any other process changes should be considered

**Substantive Elements** (typically apply to the distributor's system)

- Are there substantive standards that need to be updated?  
Removed?
- Does modern distribution require additional quality elements?
- Should auditors be looking at other features of the business?
- Is the documentation matrix still correct?



# Want to Join the Subcommittee?

- The project is expected to come to a final report before the end of the year, so the Association can coordinate with other authorities and make a final report to the FAA
- We need committed individuals who are willing to devote attention to this important issue
- Send an email to Michele Dickstein at [michele@aviationsuppliers.org](mailto:michele@aviationsuppliers.org) to express your desire to join the subcommittee
- Not a requirement to attend workshop on Monday afternoon but the expectation and planning for this project will start then



# Export Compliance Update

Jason Dickstein



“At no point in history have export controls been more central to our collective security than right now.”

**Opening Statement:**  
U.S. Bureau of Industry and Security  
“Year in Review” 2023



# Aircraft Parts Distributors are Going to Jail [for *supporting Iran*]

## Persons in the U.S.

- Joyce Eliabachus pled guilty to exporting aircraft parts to Turkey and the UAE for subsequent shipment to Iran
  - 18 months in prison
- Stefan Gillier was found guilty in connection with a scheme to fraudulently obtain aircraft parts from Honeywell International, Inc. (Honeywell), and then export them to Iran via Turkey
  - 84 months in prison
- David Levick pled guilty to charges related procuring and shipping aircraft parts classified under ECCN 9A991, and shipping through Malaysia to Iran
  - 24 months in prison

## Persons From Outside the U.S.

- Arzu Sagsoz worked for a Turkish aviation supply company – he bought aircraft parts and sold them to Mahan Air in Iran
  - 20 months in prison
- Erdal Akova used his Turkish company to buy epoxy from the US and then sell it to Iran Aircraft Manufacturing Industrial Co.
  - 36 months in prison
- Issam and Usama Hamade of South Africa procured aircraft parts and engines and re-exported them to Hezbollah in Lebanon
  - Issam: 26 months in prison
  - Usama: 42 months in prison



# BIS Focus Includes Aircraft Parts

- BIS published the **Common High Priority Items List** (CHPL) on February 23, 2024
- These are part that BIS believes are needed by Russia to prosecute their war against Ukraine
  - These items pose a heightened risk of being diverted illegally to Russia
- The CHPL includes aircraft parts exported under Schedule B code 8807.30



# Disruptive Technology Strike Force and KleptoCapture

- Two men from Miami-Dade County pled guilty in April 2024 to procuring aircraft parts for Russian commercial airlines (*United States v. Besedin and Patsulya*, District of Arizona):
  - Took orders from Russian airlines, but claimed the orders were for Turkish end users
  - Approached aircraft parts suppliers in the United States, lied about who their customers were, and lied about where the parts would be going
  - Routed the shipments through the Maldives
- Sanctioned Parties
  - Florida company MIC P&I, LLC
  - Russian airline Smartavia
    - Rossiya Airlines and Pobeda Airlines had already been subject to TDOs (Pobeda added to SDN list May 1)
  - Freight forwarder Intermodal Maldives
  - Oleg Patsulya and Vasili Besedin



# Aviation Export Enforcement

- Two Kansas men (Robertson and Buyanovsky) and their company KanRus Trading Company
  - Shipping avionics to Russia through third countries, including Armenia and Cyprus
  - Receiving Russian avionics for overhaul, getting them serviced, and returning them to Russia
  - Buyanovsky pled guilty in December 2023; New indictment against Robertson filed in March 2024



# BIS Sanctions for Technology Release

- 3D Systems Corp (DDD) had a business unit in China that provided on-demand manufacturing
- DDD sent export-controlled blueprints for aerospace and military electronics to its business unit in China and Germany
- Technology was controlled under 9E515 (“spacecraft and related commodities”)
- BIS fined DDD \$2,777,750 for exporting the export-controlled blueprints to China and Germany



# New Sanctions are Being Issued Frequently

- Two weeks ago, the US Government increased the pressure with respect to Russian sanctions:
  - State added over 100 new SDNs including at least five aircraft parts distributors
  - Commerce issued new Temporary Denial Orders against non-US aircraft parts distributors who were selling parts into Russia
    - Selling to Pobeda and S7
  - **Commerce added denial orders against addresses involved in shipments to Russia**
    - Addresses were business services organizations that offered a mailing address to many businesses
    - The addresses include companies that claimed to be aircraft parts distributors



# CSL SEARCH

Search all [the screening lists](#) at one time by filling in the search boxes below. If you get too many results, try including more information to the additional fields. If you get too few results, try searching one field at a time.

### Name

Search for an entity's name or one of its alternative names.

### Fuzzy Name

When set to "off", the spelling of the Name you search for must be correct to get results. When set to "on", the spelling for the Name you search for may be slightly off from the exact spelling. Check the score for each result to determine how close a match it is to the entity's name or its alternative names. A score of 100 is an exact match. Results are returned with the highest scores first. Fuzzy search filters out the following common words: co, company, corp, corporation, inc, incorporated, limited, ltd, mrs, ms, mr, organization, sa, sas, llc, university, and univ. For example, 'Water Corporation' returns the same results as 'Water' because 'Corporation' is one of the common words.

### Address

Search for the street address, city, province, and postal code of an entity.

### Sources

Choose which of the screening lists that you want to search.

### Countries

Choose which countries that you want to search. Note, the Nonproliferation Sanctions and ITAR Debarred lists do not include the country with an entity. If you choose to search for entities by country then you will not be searching these two lists.

Search

1 result.

[Address 01](#)

1

Leave "Name" blank

Set "Fuzzy Name" to 'Off'

Plug-in the Address you want to check

Results



# Analyze Your Exports For **Every** Transaction

- Denied party lists are constantly changing
- SDN lists are constantly changing
- Sometimes restricted items become unrestricted!
  - On April 19, export treatment of Australia and UK were changed
  - Analogous to Canada
  - Many license requirements were removed from the regulations for these two destinations



# ASA Upcoming Training

- ASA will have two export compliance trainings on Tuesday
  - Tuesday 10:30-noon: Jason Dickstein with an overview of the compliance process
  - Tuesday 1:30 – 3:00: Jared Knights and Lisa Matos with a discussion of their experiences, and practices for compliance
- ASA will once again present “Export Week”
  - Tentatively scheduled for October 7-11, 2024
  - 30 minute “lunch hour” presentations on each day
  - Q & A after each session
  - A great way to train all employees on basic export compliance topics



# Need More Information?

- ASA maintains a blog of aircraft parts distribution topics, including export topics:

[aviationsuppliers.wordpress.com](https://aviationsuppliers.wordpress.com)  
[aviationsuppliers.wpcomstaging.com](https://aviationsuppliers.wpcomstaging.com)

- Search for past articles
- Subscribe for future articles



# Thank You!

Jason Dickstein

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Washington Aviation Group

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Jason@WashingtonAviation.com



# Mischaracterizations about ASA and AC 00-56

Michele Dickstein



# ASA Registered Marks

- ASA owns four registered marks



- ASA also owns (other) unregistered marks

## ASA-100





# ASA Registered Word Marks

- ASA owns rights to certain registered word marks
  - ASA
  - Aviation Suppliers Association
  - ASA 100-Accredited
  - ASACB



# Problem

- When someone else uses one of our marks, especially if it implies an affiliation with ASA, this can violate US law
- For example:
  - An unaccredited person using an ASA mark to suggest they are accredited
  - A non-member using an ASA mark to suggest they are a member
  - A person using the term “ASA-100” to suggest they have been audited to the ASA-100 standard when that is not true
  - A person using the term “ASA-100” to suggest they have they authority to perform ASA-100 audits (ASA has not licensed this standard to anyone else)



# Misuse of ASA Marks

- Misuse of ASA marks can be misleading or even fraudulent
- This can create an unwarranted trust based on incorrect assumptions



# What Do We Want You to Know?

- Understand the difference between ASA membership and ASA accreditation
- ASA members have joined the trade association



- ASA accreditation means that you've passed a quality system audit

## ASA-100





# What Do We Want You to Know?

- Understand the difference between ASA membership and ASA accreditation
- ASA members have joined the trade association



- ASACB certification means that you've passed an audit to one of the other standards administered by ASACB





# What Do We Want You to Know?

- If you see a membership or accreditation logo, then you can check for it on the Association website – if the company is not listed there, then there may be a problem!
- <https://www.aviationsuppliers.org/Member-Directory>
- <https://www.aviationsuppliers.org/ASA-100-Accredited-Companies>
- <https://www.aviationsuppliers.org/FAA-AC-00-56B>



# Identifying and Combatting Fraud

Jared Knights

# Protect Yourself - Watch for Red Flags!

- Workshop Tuesday!
- Multiple Cases of Fraud in recent years – We will discuss many!
- Fraud is coming from Domestic and Foreign actors
- Two cases of vendor fraud alone encompassed:
  - Parts sold to NATO, NASA, Private Traders and Airlines.
  - Over \$10.5 MILLION
  - 14 years 7 months in FEDERAL PRISON

# Lessons Learned – This and More!

- Convicted of Fraud - (Vendors)
  - Amanullah Khan – California Aircraft and Avionics Corp
  - Kyle Wine - Jet pro, Nexus, Turbotech Partners
- Convicted Trans-shippers - (Customers)
  - Oleg Patsulya & Vasilii Besedin
    - Evading Sanctions
    - Money Laundering
    - This case has many red flags to learn from
- **We will discuss what they all have in common!**

# Fraud On The Rise!

Sometimes it's easy!

7. Description:	8. Part Number:	9. Eligibility:*	10. Quantity:
CONTROLLER ENGINE ELECTRONIC	EECU1000-01AD	N/A	1 EA

Sometimes not!

6. Item	7. Description	8. Part No.	9. Qty.	10. Serial No.	11. Status/Work
01	BR710 SEE GX	EECU1000-01AD	1 EA	E0064288	NEW

12. Remarks  
REF: CMM 73-25-16 ISSUE 1 JUN 14/13 AND APPROVED DESIGN DATA.  
SOFTWARE STD: X2.0.  
TSN/CSN: NOT KNOWN.  
NMSB: EECU1000-73-102 INITIAL ISSUE SEP 26/08 SATISFIED.

# Fraud On The Rise!

Tips on training your team from real cases of Fraud and SUPs

15. Authorized Signature: N/A	16. Approval/Authorization No.: N/A	20. Authorized Signature: REDACTED	21. Approval/Certificate No.: REDACTED
17. Name (typed or printed): N/A	18. Date: N/A	22. Name (typed or printed): REDACTED	23. Date: MARCH/07/2001

**User/Installer Responsibilities**

It is important to understand that the existence of this document alone does not automatically constitute authority to install the part/component/assembly.

Where the user/installer performs work in accordance with the national regulations of an airworthiness authority different than the airworthiness authority of the country specified in Block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts parts/components/assemblies from the airworthiness authority of the country specified in Block 1.

Statements in block 14 and 19 do not constitute installation certification. In all cases aircraft maintenance records must contain an installation certification issued in accordance with the national regulation by the user/installer before the aircraft may be flown.

FAA Form 8130-3 (6-01)

\* Installer must cross check eligibility with applicable technical data.

NSN: 0052-00-012-9005

# Penalties for Violations

## The Wendell H. Ford Act

Criminal penalties for knowingly falsifying aviation manufacturing/quality documents

Outcome	Individual Fine	Individual's Imprisonment	Company's Fine
Part Installed	\$500,000	15 Years	\$10,000,000
Cause of Injury	\$1,000,000	20 Years	\$20,000,000
Cause of Death	\$1,000,000	LIFE	\$20,000,000
Other than the above	Individual's Fine	10 Years	\$10,000,000

The Wendell H. Ford Act became law on April 5, 2000.

# Export Diligence

- Examples of the quickly changing environment and tactics being used.
- Fake Airlines and Shell Companies
- Common Diversion attempts for export compliance
- Red Flags Prescribed by FINCEN and other Gov't agencies
- Advantages of working with your local agent

# Tuesday afternoon we will also cover:

- Common Diversion attempts for export compliance
- Examples of the quickly changing environment and tactics being used.
- Resources for vetting and confirming information
  - Accreditations – IAF, ASA, IAQG
  - Business Filings and Information
- General Prohibitions that make decisions easier.



# Forming a Subcommittee on LLP Documentation Standardization

Sherry Chaput

# **Re-energizing the Discussion for Documentation Clarification for Life-Limited Parts**

**23-JUNE-2024**

**Aviation Suppliers Association**

**Quality Committee Meeting**

**Scottsdale, AZ**

## Mission:

To update the IATA Guidance Material and Best Practices for Life-Limited Parts (LLPs) Traceability.

## Scope:

- Invite all stakeholders to participate.
- Discuss changes within the industry since the Guidance was published in June 2020.
- Workshop K; Tuesday, June 25, 2024; 10:30 AM-12:00 PM
- Bring issues, ideas, and possible solutions to the table for discussion.

## Timeline:

- Bi-weekly meetings via TEAMS.
- Draft verbiage to be presented to the QC Leadership by 09-October-2024.
- Final Draft to be presented to ASA President and Counsel by 23-October-2024.
- Final Draft to be presented to the members of the QC Meeting in December 2024.
- Final to be delivered to IATA in January 2025.

# Questions?

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# New Business