



Welcome!

ASA Quality Committee Meeting

June 1, 2025

Ft Lauderdale, FL

Thank You to our Sponsor!





ASA Antitrust Statement (Page 1)

- As a matter of policy and practice, ASA will not lead nor participate in discussions that could violate the existing competition laws of the United States.
- In order to help facilitate compliance, there are four areas of discussion that ASA members should always avoid at ASA meetings:
 - Agreements to do business, or to refuse to do business, with any company that buys or sells aircraft parts
 - Agreements concerning any issue that affects price, including labor costs, standard discounts, etc.
 - Agreements to divide, allocate, or otherwise limit markets
 - Agreements to limit production or availability of parts



ASA Antitrust Statement (Page 2)

- By avoiding these subject areas, we make it less likely that we will inadvertently enter into an agreement in restraint of trade of the sort that is forbidden by existing law.
- Anyone who wishes to discuss subject matters falling within one or more of these areas should seek legal counsel and should also engage in such discussions outside of the supervision or control of ASA.
- Antitrust laws can be counter-intuitive to most business-people. Please do not hesitate to ask ASA's legal staff if you are uncertain about whether your proposed topic of discussion bears potential antitrust jeopardy:
 - Michele Dickstein, President
 - Jason Dickstein, General Counsel
 - Clara Greceanu, Associate Counsel



Introductions

Please state your name, title or role, and company



ASA Announcements

Michele Dickstein



- Board of Directors has approved additional financial resources:
 - Technical Representative for Quality Committee and support of the Association representation at Government and Industry level.
 - Communication/Brand Champion
 - Support with Audit Programs including Scheduling and Planning
 - Replacement of InteleX Software
 - New association customer database, new website and accounting systems including consulting services for implementation



- Change to the ASA Member Certificate
 - Language added to member certificate – **A member certificate does not represent that ASA has audited, approved or validated the member's quality system.**
 - Language from header of the Membership Listing: **Membership does **not** require an audit, the membership certificate does not mean the company is accredited to ASA-100. For verification if a company is ASA-100 or FAA AC 00-56 check those databases.**



ASA-100 and ASACB Program Update

Sam O'Connor



Witness Audit Outcomes

ASACB is audited annual by its accreditation body, ANAB:

- Field Witness Audit completed March 6-7, 2025, to AS9120B:
 - Outcome one non-conformance issued.
- Annual Office Audit completed April 28 to May 1, 2025, covering all accredited programs:
 - Outcome two non-conformance issued. One against base ISO/IEC 17021-1 requirement and the other against AS9101 requirement.
- Two additional field witness audits required before end of 2025
 - One for ISO/IEC 27001 and,
 - One for AS9120B, scheduled for 11/1/2025.
- Based on the total number of issued certifications ASACB will have 10 days of required witness audits in 2025 in addition to the 4-day annual office audit.



Industry Update

During the spring AAQG (America's section of the IAQG) meeting, several key discussions took place that will impact all organizations participating in the AS91XX certification system. While some of these updates may present challenges, we believe it is essential to keep you informed about the IAQG's ongoing initiatives and developments. Below is a summary of key topics, including updates on the AS91XX standards, OASIS, and other governing documents.

Update on the AS91XX Standard Revisions

Although an official release date has not been announced, the IAQG has outlined a transition timeline.

The transition period will span **13 months**, after which all audits will be conducted in accordance with the new revision.

Certification Bodies (CBs) will have **8 months** to submit their transition applications to their accreditation bodies for review and approval prior to conducting audits under the new standards.

Months 5–8: Auditor training period

Months 8–13: Final approval for CBs

Month 13: All CBs begin auditing according to the new revisions simultaneously



Industry Update Continued

The IAQG is currently developing auditor training materials.

OASIS is undergoing programming updates to support the revised standards. While these updates will be visible in OASIS before the official release, they will only become operational upon full implementation of the new revisions.

IAQG has confirmed that **clients will not incur additional charges** for certificate updates necessitated by the new revisions. A new billing exception will be listed in OASIS specifically for these changes.

Bottom Line: The release date remains uncertain. Although the IAQG has stated that the implementation timeline is firm, changes may still occur prior to document publication. ASACB will offer **free training** to clients on the new requirements upon release.



Industry Update Continued

OASIS Enhancements and Associated Fee

On **April 1, 2025**, IAQG introduced **OASIS Insights**, a data-driven reporting tool integrated within OASIS. Once ASACB publishes an audit, clients will have access to these reports. [Click here to learn more: OASIS Insights – IAQG](#)

On **April 29, 2025**, IAQG launched a series of **Digital Innovation Enhancements**, expanding the IAQG Certification Scheme with new data services, including **OASIS Insights benchmarking**, an **interactive reporting tool**, and data feeds for certified organizations. [Click here to learn more: Digital-Innovation-FAQ_March2025.pdf](#)

As part of this initiative, IAQG has implemented a **\$250 per audit fee**. This became effective **May 15, 2025**, for **initial certification, recertification, and surveillance audits**. CBs will collect this fee from clients and remit it to the IAQG.

Standalone special audits will be **exempt** from this fee.

Industry Update Continued



The **Digital Innovation Enhancements** are designed to redefine the value of certification and improve quality system performance. Benefits of these enhancements include:

- Improved understanding of quality management system performance
- Data-driven insights to identify and implement more targeted solutions
- Deeper visibility into supplier performance

Bottom Line: As of **May 15, 2025**, this fee will apply to all relevant audits, and opting out of this functionality is not permitted.

Potential Future Updates

The draft revision of **AS9104-1** currently proposes only **two site structures: single and multiple sites**. Concerns have been raised regarding potential increases in certification costs due to additional audit days required under the multiple site calculation. Industry discussions are ongoing, with consideration being given to retaining the **campus structure**.

IAQG is exploring the possibility of issuing all AS9100/AS9110/AS9120 certificates directly through OASIS. Certification Bodies have expressed concerns about this potential change, and ASACB will provide updates as more information becomes available.



QMS CERTIFICATION BY STANDARD

ISO 9001	AS9100	AS9110	AS9120	ISO27001	TOTAL
32	109	32	107	1	281

QMS CERTIFIED LOCATIONS

ISO 9001	AS9100	AS9110	AS9120	ISO 27001	TOTAL
44	156	60	179	1	440



QMS CERTIFICATION BY COUNTRY

U.S. - 201	U.A.E. - 7	U.K. - 34	Netherlands - 2	China - 4	Turkey - 1
Denmark - 4	Germany - 2	Ireland - 5	Jordan - 3	Singapore - 3	Switzerland - 2
France - 4	Hong Kong - 1	Serbia - 1	Malaysia - 1	Spain - 1	Canada - 2
Czech Rep. - 1	Australia - 2				



ASA-100 UPDATE

Audit Sites by Country



COUNTRY	2024	2025	DELTA
AUSTRALIA	5	5	0
AUSTRIA	1	1	0
CANADA	9	10	1
CHILE	1	1	0
DENMARK	5	6	1
EL SALVADOR	1	1	0
ESTONIA	1	1	0
FRANCE	7	8	1
GERMANY	8	8	0
GREECE	1	1	0
HONG KONG	18	23	5
INDIA	2	2	0
INDONESIA	1	1	0
IRELAND	10	10	0
ISRAEL	1	1	0
JORDAN	7	7	0
LITHUANIA	2	2	0
LUXEMBOURG	1	1	0
MALAYSIA	4	5	1

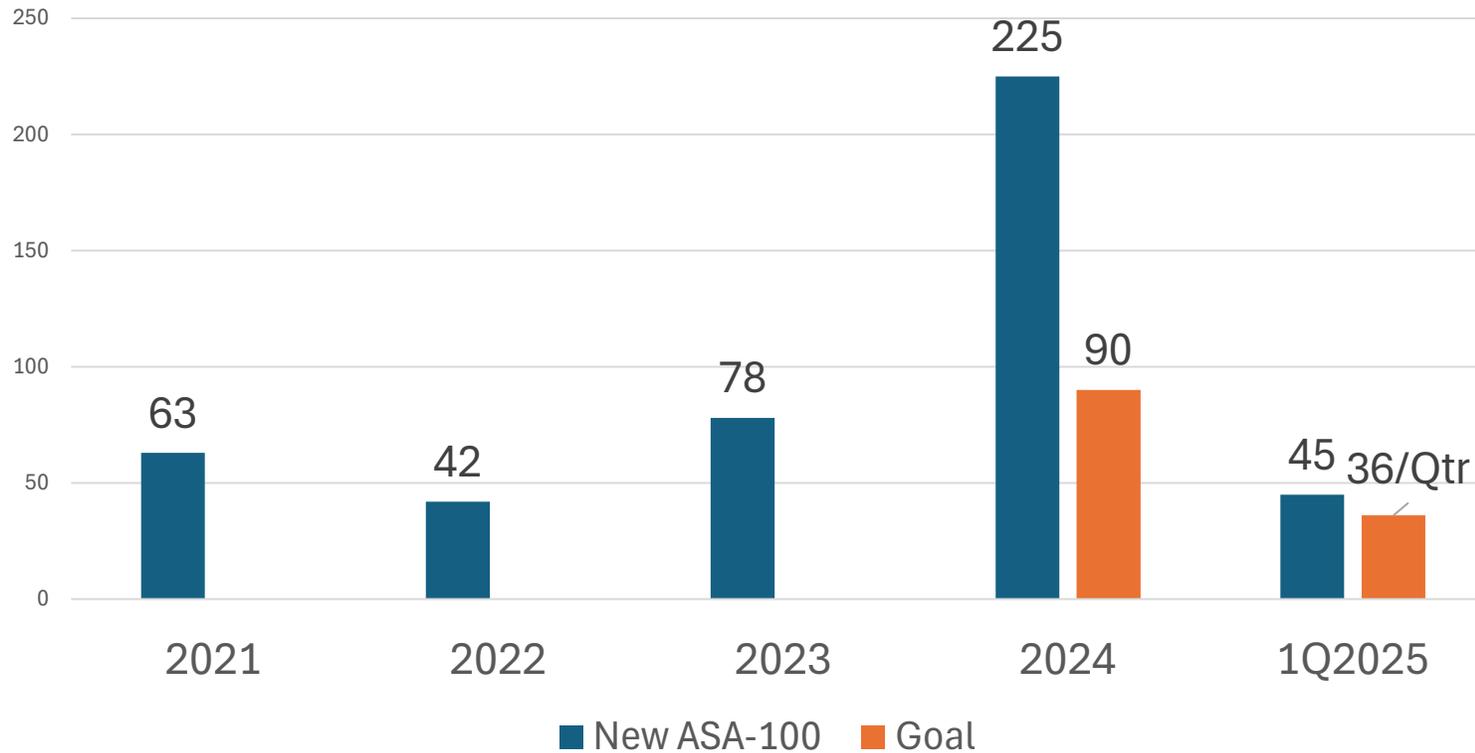
COUNTRY	2024	2025	DELTA
NETHERLANDS	6	7	1
NIGERIA	1	1	0
PANAMA	3	3	0
PEOPLE'S REPUBLIC OF CHINA	86	100	14
PERU	2	2	0
POLAND	1	1	0
SINGAPORE	34	36	2
SOUTH AFRICA	5	5	0
SOUTH KOREA	1	1	0
SPAIN	1	2	1
SWEDEN	3	3	0
SWITZERLAND	4	4	0
TAIWAN	2	2	0
THAILAND	3	5	2
TURKEY	3	4	1
UNITED ARAB EMIRATES	20	22	2
UNITED KINGDOM	47	48	1
UNITED STATES	474	518	44
Grand Total	781	858	77

Audit Sites Worldwide – 858

New Sites (45 Companies) since end of 2024 - 77



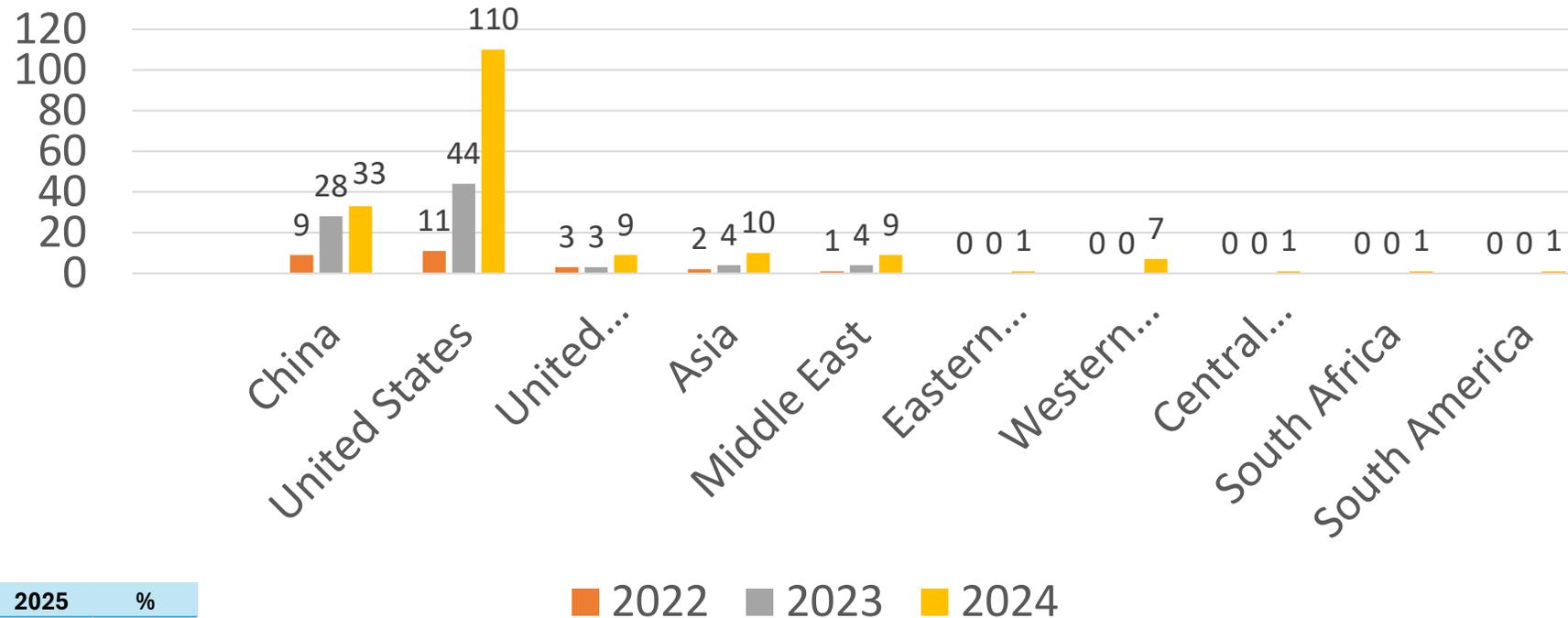
ASA-100 Accreditations - New Companies by Year



The 45 new companies are through 1Q2025
(This number is lower than by country due companies with multiple sites)



ASA-100 New Accreditation by Region Three-year



REGION	2025	%
NORTH AMERICA	528	62%
PR CHINA/HK	123	14%
EUROPE (ex UK)	59	7%
UNITED KINGDOM	48	6%
SINGAPORE	36	4%
MIDDLE EAST	30	3%
ASIA (ex CH/HK/SGP)	16	2%
CENTRAL/SOUTH AM.	7	1%
AFRICA	6	1%
PACIFIC	5	1%
TOTAL	858	100%



TOP 6 : NCRs by ASA-100 Element

ASA-100 Clause	2024 # NCRs	2024 % NCRs	1Q2025 # NCRs	1Q2025 % NCRs
1. Quality System and Quality Manual	338	12%	82	13%
2. Self-Audit/Evaluation & Accreditation Programs	221	8%	51	8%
4. Training and Authorized Personnel	518	18%	97	15%
5. Procurement	526	18%	114	17%
8. Material Control	327	11%	85	13%
10. Certification & Release of Materials	278	10%	51	8%

TAKEAWAY:

- Interesting that the Top 6 clauses for NCRs is the same in 2024 and YTD 2025.

NCR Appeals



NCR	Clause	Approved	Finding
2024-01	6A	NO	All requirements of receiving inspection were being deferred for AS REMOVED parts except the Visual Inspection
2024-02	4A	NO	When error was found on an 8130, the incorrect 8130 was being shredded after the corrected 8130 was received
2024-03	15A	YES	Related to control of HAZMAT material when surplus/aftermarket lot is purchased
2024-04	1C	YES	Related to the accessibility of QMS Documents
2024-05	2A	YES	Related to requiring revision control on the ASA-100 Self-Audit Checklist
2024-06	4E	NO	Related to Training Records for SUP/CFP
2024-07	10A	YES	Related to Certified True Copy Process – Using ERP rather than Wet Stamp

NCR Appeals



NCR	Clause	Approved	Finding
2025-01	2A	NO	Not recording appropriate Objective Evidence on the Self-Audit Checklist
2025-02	5C	YES	One Time Approval for Suppliers not in the Workflow Diagram in the QM
2025-03	10D	NO	Related to not following the company's documented procedure for reconciling split batches/lots
2025-04	1E1	YES	Org chart had Quality reporting to Supply Chain
2025-05	4D	YES	No alternates listed on the Inspection Roster
2025-06	5C	YES	Approval Criteria not listed on the Approved Supplier List
2025-07	6B	YES	Related to requirement to have the Original Certified Statement for Fasteners called out in the QM
2025-08	8H	NO	The nonconforming cage was not labeled or secured
2025-09	Failed Surv.		Cert Revoked - Organization failed to maintain an ASA-100 compliant QMS after receiving their initial certification. There were 11 NCRs in 2024 and 11 NCRS In 2025
2025-10	Failed Surv.		Cert revoked - due to excessive and repeat findings. 14 NCRs in 2025 of which 4 were repeat findings, 22 Findings in 2024.



Government Affairs Update: *Certain* ASA Projects

Jason Dickstein



AC 00-56B Update

- FAA is working on AC 00-56C
- Last summer we convened a working group (led by Ron Wolf) to examine AC 00-56B and make recommendations
- The working group put together a preliminary list of recommendations to meet an early deadline
- Additional working group recommendations may be offered when the draft AC becomes available for comment



AC 00-56C Update – Certified True Copy

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- Define “certified true copy”:

An accurate duplication of a document that is certified as accurate (a ‘true copy’) by the distributor. The distributor’s certification statement need not be formal – it can be any statement indicating that the copy is an accurate copy. The statement should be identified so as to indicate its source, such as with a signature, a stamp, or a company letterhead. The distributor shall have a process in its quality manual that describes how it makes a ‘certified true copy.’



AC 00-56C Update – Shipping Criteria

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- AC 00-56B section 7(b)(1) requires a receiving inspection process. We recommended that this process include shipping.
 - (1) Receiving and Shipping inspection process that confirms products and articles are accompanied by documentation that shows the prior source of the product or article and satisfies at least one of the “Required on Receipt” requirements listed in Appendix [1](#), Documentation Matrix.



AC 00-56C Update – Recurrent Training

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- AC 00-56B section 7(b)(2) requires a training system. We recommended that this include recurrent training.

(2) A system for initial and recurrent training of the distributor’s personnel to ensure that the distributor properly executes the quality system, including the elements of the quality system that fall within the trained person’s responsibility and/or job function.



AC 00-56C Update – Shelf Life

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- AC 00-56B section 7(b)(6) requires a shelf life control system. We recommended stating the goal of the system to create a performance-based standard.

(6) A ~~shelf-life control system to~~ adequately identify and control shelf life-limited parts and materials, to ensure that no expired material or part will be represented as having remaining shelf life. ~~that helps the distributor meet quality and technical criteria for each part that has a shelf life.~~

AC 00-56C Update – Government Notices



- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- ASA recommended that the VIDAP require review of UPNs or corollary documents (from the local airworthiness authority) by adopting a 19th element under subsection 7(b):

(19) A process for identifying and reviewing unapproved parts notices that have been issued by the FAA, and, if the distributor is located outside the United States, then identifying and reviewing unapproved parts notices that have been issued by the airworthiness authority with geographic control of the jurisdiction in which the distributor stores parts.



AC 00-56C Update – Mutilating Scrap Parts

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- ASA recommended that the VIDAP require mutilation of parts *that the distributor chooses to designate as scrap* by adopting a 20th element under subsection 7(b):

(20) A process for mutilating parts that have been identified as “scrap” by the owner of the parts. Mutilation shall be accomplished by drilling, grinding, or other appropriate means sufficient to reasonably preclude the part from being returned to service as an aircraft part. This element shall not require that any particular part be identified as “scrap” and it shall not inhibit the use of aircraft parts for non-aviation uses.



AC 00-56C Update – Related Reading

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- ASA recommended that the FAA add “AC 20-154, Guide for Developing a Receiving Inspection System for Aircraft Parts and Material” to the list of related reading materials in section 4(a) of AC 00-56B.

Related Reading Materials

AC 20-154, Guide for Developing a Receiving Inspection System for Aircraft Parts and Material



AC 00-56C Update – Auditor Training

- Last summer, ASA submitted to the FAA a “wish list” of changes we wanted to FAA AC 00-56
- ASA recommended that the FAA include a requirement for auditor training.

e. Auditor Training. In addition to the above qualifications, each qualified auditor shall have initial and recurrent training in aircraft parts documentation, aircraft parts warehousing, aircraft parts receiving and aircraft parts shipping. This training may be obtained through experience, on-the-job training or formal training.



AC 00-56C: Next Steps

- The AC 00-56C update was delayed with all of the other government projects
- When it is available for comment, we will let the industry know, and we will examine the draft to identify other priorities



8130.21

- Instructions for the completion of the 8130-3 tag
- **Comment period closes June 6, 2025 (*Friday*)**
- Instructions are being split into two documents
 - AC 43-9D for approval for return to service (right-side signature)
 - ASA commented last year
 - Order 8130.21J for airworthiness approval (left-side signature)
 - Now open for comments

D.O.T. Request for Regulatory Simplification



- The Administration requested comments on what it could do to improve the regulations
- ASA replied to the Department of Transportation solicitation
- *FAA has said that they are already looking at our filing!*



ASA's Regulatory Change Wish List

- **Removing the unnecessary packaging duration requirement from 14 C.F.R. § 21.335(b)**
- *Requires an exporter of aircraft parts to state the duration of effectiveness of the packaging*
- There is no aviation safety benefit to this rule
- There has never been a clear metric for compliance
- This has never been enforced



ASA's Regulatory Change Wish List

- **Ensuring that maintenance manuals are readily available to the repair stations that our members use for component repair**
- Supporting the FAA in enforcing the plain language of 14 C.F.R. § 21.50(b)
- This is also consistent with the antitrust rulings in *Kodak v. Image Technical Services*, which found an attempt to monopolize when manuals were withheld from the service aftermarket



ASA's Regulatory Change Wish List

- **Improving traceability through parts markings and parts documentation consistent with the FAA's 2006 proposal**
- FAA proposed requiring 8130-3 for all new parts
 - Improving mechanisms for obtaining 8130-3 on existing parts
- FAA proposed adding part number marking to all parts made under US production approval
 - This will help to correlate parts to their documentation
 - PAH part markings are representations reflecting aircraft parts quality so they may provide the FAA with additional power to address unapproved parts issues
 - Exceptions already exist for small parts or parts where marking is otherwise impractical



Government Affairs Update: LLP Documentation

Sherry Chaput



Committee Review

1. Last June a committee was formed representing all stakeholders to update the IATA Guidance Material and Best Practices for Life-Limited Parts (LLPs) Traceability.
2. The committee met for 90 minutes a week over the span of 14 weeks via TEAMS.
3. The final Draft was presented to QC Leadership, ASA President, and Counsel in October of 2024.
4. The final Draft was presented at the QC Meeting in December of 2024.
5. The final Draft was presented to IATA in January of 2025.

Overview of changes:

1. Cleaned up verbiage to be clear and concise.
2. Expanded on Abbreviations and deleted ones that did not pertain to documentation to reduce confusion.
3. Highlighted guidance that has been overlooked as determined by the committee.
4. Added an Appendix for Time milestone for statements.



IATA Meeting March 2025:

1. IATA agreed with the Draft with minor verbiage changes.
2. IATA then asked the committee to further expand the Guidance to include Landing Gear and Auxiliary Power Units (APU).
3. The reason behind the expanded Guidance is that IATA would like to present to ICAO for acceptance in September 2025.

Committee reconvened:

1. The committee accepted and began weekly 90 minutes on 28-April.
2. Timeline is ambitious with 10 to 12 weeks to meet the September goal.

Goals for Landing Gear and Auxiliary Power Units (APU):

1. Keeping the same format as the engine LLP section.
2. Add common terminology matrix appendix.
3. Add Glossary Appendix.
4. Add Templates.
5. Add Figures.
6. Add Tables.



Break

10:30 am – 11:00 am



Government Affairs Update: Import Compliance

Jason Dickstein



Tariffs!

- US has imposed 10% tariffs for most products of other countries
- Example:
 - Current US tariffs of 10% for product of the European Union, like many Airbus parts
 - US tariffs are scheduled to increase to 20% for product of the European Union on July 9, 2025
 - The administration threatened to increase US tariffs to 50% on June 1 for product of the European Union (*this has since been postponed to July 9*)
- **For more details, see the ASA blog at aviation-suppliers.org**
 - ***We've addressed many of the issues in more detail in the blog articles***



Tariffs Are in Flux

- More change than normal
- Creating economic uncertainty
- Example
 - The Court of International Trade vacated many of the country-based “Trump Tariffs” on Wednesday
 - The Federal Circuit Court stayed that order - and thus the “Trump Tariffs” remained valid – on Thursday
 - Temporary injunction briefs are due June 5 and 9, so a ruling on whether the tariffs remain valid or are stayed during the case should be issued soon.
 - The underlying case may take much longer



Non-US Tariffs on Products of the U.S.

- Some nations have applied new tariffs to products of the U.S. (e.g. China)
- Some nations are threatening new tariffs on products of the U.S. (e.g. European Union)

- Thus, this is not just a U.S. import concern



EU Tariffs: Products of the United States

- *EU has circulated proposed tariff targets*
- **Included (subject to duty):** Aircraft under CN Heading 8802
- **Excluded (expected to remain duty-free):** Aircraft parts under CN Heading 8807
 - Many (*but not all*) aircraft parts fall within CN Heading 8807
- **Included (subject to duty):** Aircraft parts under certain OTHER CN Headings ...



EU Tariffs on Products of the U.S.

Combined Nomenclature Subheading	Description
40113000	new pneumatic tires, of rubber, of a kind used for aircraft
40121300	retreaded pneumatic tires, of rubber, of a kind used on aircraft
70071190	toughened "tempered" safety glass, of size and shape suitable for incorporation in aircraft, spacecraft, vessels or other vehicles
85443000	ignition wiring sets and other wiring sets for vehicles, aircraft or ships
90142080	instruments and appliances for aeronautical or space navigation (excl. inertial navigation systems, compasses and radio navigational equipment)
91040000	instrument panel clocks and clocks of a similar type for vehicles, aircraft, vessels and other vehicles
94019110	parts of seats used for aircraft, of wood, n.e.s
94019910	parts of seats used for aircraft, n.e.s.

- This is a sample of aircraft-related items in the EU proposed list – it is not a complete list!!
- This EU list is available for comment, but has not yet been implemented



Tariff Top Ten



Strategies for Mitigating Tariffs

- **Rule Number One:**
Communicate with your business partner. Make sure that you are cooperating to make the right certifications and/or representations to minimize the effect of U.S. tariffs.
- Elements like rules of origin and exceptions can get complicated so be sure to gather the facts and use a lawyer when you need one
- **Communicate**



Strategies for Mitigating Tariffs

- **Rule Number Two:** Identify your parts properly!
- **Proper Identification**
- There is a default heading 8807 that applies to aircraft parts
- But if there is a *more specific* heading then you must use the more specific heading!!



Strategies for Mitigating Tariffs

- **Rule Number Three:** Try to identify strategies for minimizing duties associated with the tariffs.
- **Look for Strategies**
- Example: In a formal Customs Ruling Request to the US CBP, my law firm has proposed a zero-duty application for Airbus aircraft and parts based on the Agreement on Trade in Civil Aircraft and certain U.S. statutes.



Rules of Origin

- The nation where an aircraft parts is manufactured or produced will typically be the origin
 - The immediate source may not matter
 - If you get an Airbus part from a Chinese warehouse, the fact that it went through China doesn't intrinsically change the country of origin
- A substantial transformation may change the country of origin to the location of the transformative process
- Complex assembly is a transformative process
 - Example: if an engine part come from the UK, but it is part of an engine assembly that takes place in the U.S. then the entire engine is a product of the U.S.



Strategies for Mitigating Tariffs

- **Rule Number Four:** Tariffs apply to non-US goods and non-US “added value”
 - If you are importing parts that were made in the U.S. (and were not advanced in value outside the U.S.), then you probably do not need to pay duty on those goods.
- U.S. goods returned to the U.S. without having been advanced in value: HTSUS 9801.00.10xx
 - [*“xx” varies depending the base HTSUS code*]
- Importing U.S. goods to the U.S.



What About U.S. Goods Advanced in Value, Abroad?

- If a U.S. Good is sent abroad for repair or processing, then when it is returned you need to pay duty based on the value of the repair or processing
 - Typically based on invoice amount
 - This is a frequent “inclusion” in the latest chapter 99 tariffs
 - Expect to pay foreign country duty rates on repairs performed abroad
- Repairs or alterations made pursuant to a warranty
 - 9802.00.40 (FMV)
- Other repairs or alterations
 - 9802.00.50
- U.S. metal article exported for further processing abroad and then returned
 - 9802.00.60



Strategies for Mitigating Tariffs

- **Rule Number Five:** If you are temporarily importing aircraft parts to the United States for repair or alteration, then consider declaring them under HTSUS 9813.00.0540
 - This process may require a bond to be posted, which is then cancelled when the goods are once again exported
 - If you install certain parts on a plane and the plane flies out of the U.S, then this is sufficient to reflect an export
- Importing parts to the U.S. *temporarily* for repair



Strategies for Mitigating Tariffs

- **Rule Number Six:** Many non-US materials will be subject to import tariffs upon entry into the U.S.
- There are special rules for certain aluminum, iron and steel parts
 - Application based on tariff code!!
- **Materials**



Aluminum, Iron and Steel Tariffs

- The tariffs apply to many of the raw materials made from aluminum, iron and steel
- The tariffs apply to some “derivatives” made from aluminum, iron and steel
 - This means parts
- **Not all parts are covered – only certain tariff headings and subheadings**
- Iron and steel tariffs do not apply to heading 8807



Aluminum Tariffs on Parts & 8807

- Aluminum is addressed:
 - HTSUS 9903.85.04 (note 19i)
 - HTSUS 9903.85.07 (note 19j)
 - HTSUS 9903.85.08 (note 19k)
- Each limits covered aluminum products to *certain* headings
- Duty rate is 25%
- 8807.30.0060 is in note 19k
- This is parts of NON-civil aircraft
 - e.g. defense aircraft: other than props, rotors, and landing gear/undercarriages
- ***Other provisions of 8807 are not currently covered as aluminum derivatives***



Strategies for Mitigating Tariffs

- **Rule Number Seven:** Complex assembly is a transformative process, and thus complex assemblies become a product of the place where they are transformed
 - Example: If it is a complex assembly from the U.S. then it is tariffed as a US good
 - Disassembly is not transformative

• Complex Assemblies



Strategies for Mitigating Tariffs

- **Rule Number Eight:** The USMCA provides for duty-free import of many products of Canada and Mexico
- There are rules for what is a product of the USMCA zone so make sure you assess origin correctly
- **There is a special USMCA certification that must be made**
 - It is easy to make if you have the facts!
- **Importing Products of Canada and Mexico**



Strategies for Mitigating Tariffs

- **Rule Number Nine:** Identify the right value
- Normally this is the price actually paid
- In a complex distribution , you may be able to use the “first sale” rule
 - the price actually paid or payable for the merchandise when sold for exportation
 - Eliminates mark-up from tariff value; but requires detailed records
- Use the right value!



Strategies for Mitigating Tariffs

- **Rule Number Ten:** Watch out for additional and unusual secondary tariffs

Examples

- An *additional* 25% tariff on most 8807 aircraft parts from China
 - HTSUS 9903.88.01
- A 35% tariff (“in lieu”) on most 8807 aircraft parts from Russia
 - HTSUS 9903.90.08

- Import Law Is Becoming More Complicated for Aviation



Government Affairs Update: Foreign Trade Zones a/k/a Free Trade Zones

Clara Greceanu



FTZs– An Import and Export Tool

- Foreign Trade Zones facilitate trade by providing a mechanism to manage certain taxes and duties
- Provide cost savings for businesses
- Enhanced global supply chain efficiency
- U.S. Foreign Trade Zones established under the Foreign Trade Zones Act of 1934
 - Administered by the Foreign Trade Zones Board and U.S. Customs and Border Protection
 - Zones include general zones and subzones
 - Proximity to a U.S. port of entry is a consideration



Dual Use Benefit

Import

- Goods in an FTZ may be stored, altered, manufactured, or produced
- Duties will only apply to those goods removed from the FTZ to enter the United States
- Re-exported goods will not be subject to duties

Export

- Once entered into the FTZ, goods are considered to be exported
- Goods entered under Temporary Import under Bond (TIB) provisions, entering them into the FTZ will fulfill the export requirement at the time the goods enter the FTZ
- Not subject to excise tax
- Generally exempt from State and Local *ad valorem* taxes



Examples

- 1) You can import parts that would normally be subject to an import duty into a foreign trade zone and they have not yet entered the customs territory of the United States
 - They are not yet subject to import duties
- 2) If you will subsequently export them, then they may never enter the customs territory of the United States
 - Not subject to import duties!
- 3) If you choose to use the parts in the U.S. (e.g. sell them to a U.S. customer) then you can pay duty at the time of entry
- 4) If duty rates are changing, then you can also optimize when you want the parts entered

Purpose of a Foreign Trade Zone for Imports



- Goods can be imported into the FTZ duty-free
 - Goods can include raw materials, components, subassemblies, semi-finished, or finished goods
- Work can be performed on the goods within the Zone
 - ‘Production activity’ requires FTZ Board authorization
- Applicable duties will only be calculated on the goods removed from the Zone to enter the United States as they are removed from the Zone
- Can be combined with Temporary Import under Bond Provisions

Purpose of a Foreign Trade Zone for Exports



- Goods taken into a Zone are subject to restrictions based on their entry status:
 - Privileged foreign status
 - Nonprivileged foreign status
 - Domestic status
 - Zone-restricted status
- Goods taken into a Zone for the sole purpose of exportation, destruction, or storage will be given zone-restricted status based on application
- Goods holding zone-restricted status may be considered exported for the purpose of any Customs law



Zones and Subzones

Foreign Trade Zones include both Zones and Subzones

- Zones ('Magnet Sites'): usually located at ports or industrial parks and open to multiple zone operators
- Subzones (& Usage-driven sites): approved for specific company or use, generally at their own facilities
- Both must be within 60 miles or 90 minutes driving time from a CBP Port of Entry
 - Subzones outside this limit may qualify if oversight measures approved by the relevant CBP Port Director are implemented



Process of Becoming a (Sub)Zone

- There are currently 303 Foreign Trade Zones in the United States
- Individual companies work with the nearest existing Zone Grantee to apply for a Subzone classification
 - Faster processing time (30 days – 5 months maximum)
 - Each Zone may charge associated fees for supporting a Subzone application, separate from the application fees
 - Once the FTZ Board approves the site, CBP must activate it before operations can begin.
- Production activity requires separate application. Production will be limited to the scope described in the application.
 - *“Activity involving the substantial transformation of a foreign article resulting in a new and different article having a different name, character, and use, or activity involving a change in the condition of the article which results in a change in the customs classification of the article or in its eligibility for consumption”*



Relevance to Industry

- Foreign parts imported for subsequent export to customers
- Foreign parts exported after domestic teardown
- Time management advantage for goods imported under Temporary Import under Bond
- Financial and supply chain planning – opportunity to store shipments domestically duty free



Thank You

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Lunch

12:00 noon – 1:00 pm



Government Affairs Update: Section 232 Commercial Aviation Investigation

Jason Dickstein



Investigation into Commercial Aviation

- U.S. has opened a *section 232* investigation into commercial aircraft, engines, and their parts
- **Purpose:** to determine the effects on national security of imports of commercial aircraft, engines, and their parts
- **Possible Effect:** Could lead to tariffs, or other import restrictions

Some § 232 Factors:

- domestic production needed for projected national defense requirements
- capacity of domestic industries to meet such requirements
- existing and anticipated availabilities of the human resources, products, raw materials, and other supplies and services essential to the national defense
- the requirements of growth of such industries and such supplies and services including the investment, exploration, and development necessary to assure such growth
- the importation of goods in terms of their quantities, availabilities, character, and use as those affect such industries and the capacity of the United States to meet national security requirements
- the impact of foreign competition on the economic welfare of individual domestic industries
- any substantial unemployment, decrease in revenues of government, loss of skills or investment, or other serious effects resulting from the displacement of any domestic products by excessive imports

Criteria for Determining Effect of Imports on National Security (15 CFR 705.4)



- Domestic production needed for projected national defense requirements;
- The capacity of domestic industries to meet projected national defense requirements;
- The existing and anticipated availabilities of human resources, products, raw materials, production equipment and facilities, and other supplies and services essential to the national defense;
- The growth requirements of domestic industries to meet national defense requirements and the supplies and services including the investment, exploration and development necessary to assure such growth
- The impact of foreign competition on the economic welfare of any domestic industry essential to our national security;
- The displacement of any domestic products causing substantial unemployment, decrease in the revenues of government, loss of investment or specialized skills and productive capacity, or other serious effects; and
- Any other relevant factors that are causing or will cause a weakening of our national economy.

Questions About Effect of Commercial Aviation Imports on National Security



- What is the U.S. domestic production needed (of commercial aviation products and parts) to support projected national defense requirements?

Questions About Effect of Commercial Aviation Imports on National Security

- What capacity of U.S. domestic commercial aviation industry production do we need to meet projected national defense requirements?





Questions About Effect of Commercial Aviation Imports on National Security

- Does the U.S. have sufficient supplies of
 - human resources
 - products
 - raw materials
 - production equipment
 - facilities, and
 - other supplies and services

to support U.S. national defense needs?

- Do imports of commercial aircraft, engines and parts affect sufficiency of any of these categories?



Questions About Effect of Commercial Aviation Imports on National Security

- Are U.S. domestic commercial aviation industries growing sufficiently to meet national defense requirements
 - Consider supplies and services
 - Consider the investment, exploration and development necessary to assure such growth
- Is this impacted by imports of foreign commercial aircraft engines and parts?

Questions About Effect of Commercial Aviation Imports on National Security



- What is the impact of foreign competition on the economic welfare of the U.S. domestic commercial aviation industry, to the extent essential to our national security?

Questions About Effect of Commercial Aviation Imports on National Security



- Are imports of foreign commercial aircraft, engines or parts displacing any domestic products?
- Is this displacement causing substantial unemployment, decrease in the revenues of government, loss of investment or specialized skills and productive capacity, or other serious effects?

Questions About Effect of Commercial Aviation Imports on National Security

- Any other relevant factors that are causing or will cause a weakening of our national economy.





What Would Be Useful?

- ASA Members comment explaining
- To what extent does defense aviation production rely on commercial aviation sources, and are the domestic commercial aviation sources sufficient to support domestic defense aviation needs?
- Does foreign competition impact the economic welfare of any domestic industry essential to our national security?



Investigation into Commercial Aviation

- Comment period ends on Tuesday June 3!
- <https://www.govinfo.gov/content/pkg/FR-2025-05-13/pdf/2025-08500.pdf>
 - Note that the questions asked in the notice are different from the standards of a section 232 investigation

Commenting Instructions

- Go to *regulations.gov*
- Search for “BIS-2025-0027”
- Refer to “XRIN 0694-XC127” in your comments



Petition related to ATCA/Tariffs

Jared Knights



Government Affairs Update: A Brief Word About Exports

Jason Dickstein



US Export Law

- Outline of U.S. export enforcement compliance
 - Check the Parties (people and entities) against U.S screening lists
 - Identify the US ECCN
 - Check the destination requirements based on the reasons for control associated with the ECCN
- The United States continues to enforce its export laws, including enforcement in re-exports



US Export Law: Foreign Aircraft Rule

- Outline of U.S. export enforcement compliance
 - Check other requirements
 - Example: parts exported, transferred or re-exported for installation on a non-US-registered aircraft must be checked against:
 - The country of end-use aircraft registry
 - The country of the operator
 - The country in which the aircraft is located
- Violating U.S. embargos / sanctions can lead to prison!
 - Russia, Iran, and Syria are some focus areas

Each of the above is analyzed as if it were an independent destination (15 C.F.R. § 744.7)

- **For more on exports:**
- Dickstein: *Building an Export Compliance System* workshop (Mon 3:30 pm)
- Knights-Matos: *Export Insights* workshop (Tues 1:30 pm).



Future Changes to U.S. Sanctions

- There is a concern that the U.S. could rapidly change foreign sanctions with little notice or planning
- This could endanger aviation safety if it invites unairworthy products to enter the market from sanctioned jurisdictions
- Example:
 - Stories from Russia have suggested that they are fabricating parts for Boeing and Airbus aircraft without coordination with the states of design
 - If such parts are incorrectly identified then they could incorrectly pass as Boeing and Airbus parts while endangering commercial aviation



Future Changes to U.S. Sanctions

- Example:

- Stories from Russia have suggested that maintenance is not being performed according to ICA norms for Boeing and Airbus aircraft
- If the maintenance standards for improperly maintained parts are misrepresented, then this could endanger commercial aviation

- Protect Yourself

- Understand the approval and documentation norms
- Provide recurrent training to your receiving inspectors
- Dickstein will be teaching a workshop: **Approved Parts and Their Documentation** on Monday at 1:30 pm

If You Identify a Problem, then Consider Voluntary Self-Disclosure (VSD)



- We've handled a large number of VSDs over the years and have had very good luck with them
- The government is typically interested in working with companies that can perform root cause analysis and corrective action
- Be sure you identify each regulation you may have infringed, so you can self-disclose to each relevant agency

EXAMPLE

- Universities Space Research Association (USRA) self-disclosed that an employee had exported software to a Chinese University on the BIS Entity List
- The employee was convicted and sentenced to 20 months in prison
- On the strength of the self-disclosure, cooperation, and corrective action, the Justice Department declined to prosecute USRA



Government Affairs Update: Documentation, Traceability and ASCIC

Michele Dickstein and Jason Dickstein

Traceability

- In the wake of the AOG Technics issue, traceability continues to be a major focus for the industry



1. Approving Civil Aviation Authority/Country: FAA/United States		2. AUTHORIZED RELEASE CERTIFICATE FAA Form 8130-3, AIRWORTHINESS APPROVAL TAG			3. Form Tracking Number:	
4. Organization Name and Address:					5. Work Order/Contract/Invoice Number:	
6. Item:	7. Description:	8. Part Number:	9. Quantity:	10. Serial Number:	11. Status/Work:	
12. Remarks:						
13a. Certifies the items identified above were manufactured in conformity to: <input type="checkbox"/> Approved design data and are in a condition for safe operation. <input type="checkbox"/> Non-approved design data specified in Block 12.			14a. <input type="checkbox"/> 14 CFR 43.9 Return to Service <input type="checkbox"/> Other regulation specified in Block 12 Certifies that unless otherwise specified in Block 12, the work identified in Block 11 and described in Block 12 was accomplished 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.			
13b. Authorized Signature:		13c. Approval/Authorization No.:	14b. Authorized Signature:		14c. Approval/Certificate No.:	
13d. Name (Typed or Printed):		13e. Date (dd/mmm/yyyy):	14d. Name (Typed or Printed):		14e. Date (dd/mmm/yyyy):	
User/Installer Responsibilities						
<p>It is important to understand that the existence of this document alone does not automatically constitute authority to install the aircraft engine/propeller/article.</p> <p>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 aircraft engine(s)/propeller(s)/article(s) from the airworthiness authority of the country specified in Block 1.</p> <p>Statements in Blocks 13a and 14a do not constitute installation certification. In all cases, aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown.</p>						

FAA Form 8130-3 (02-14)

NSN: 0052-00-012-9005



AOG Legal Fallout

- According to the Press in Portugal:
 - Gonçalo Trinchante, Amândio Geada and Manuel de Almeida, together with an Argentinian citizen, are suspected of a scheme to steal parts from TAP Portugal
 - The scheme is estimated to have involved 12 million euros worth of parts
 - Portugal claims that for seven years, from 2015 to 2022, Gonçalo Trinchante, who was in charge of TAP's warehouse, allegedly supplied José Yrala with parts and other components that had been stored on the company's premises
 - The allegedly stolen components were then sent to AOG Technics in England
- On May 28, UK Serious Fraud Office (SFO) announced that they would charge Jose Alejandro Zamora Yrala (of AOG Technics) with fraudulent trading



AOG Practical Fallout

- ASA worked with ASCIC to support their report
 - Many of their recommendations were based on existing ASA projects
- ASA has made an internal commitment to implement as many of the ASCIC recommendations as it can accomplish



ASCIC Results: Vendor Accreditation

- Short Term: The industry should use AC 00-56 accredited suppliers
- Short Term: Establish a mechanism for parts buyers to “provide non-prejudicial feedback” on compliance with the relevant quality process standards and use this feedback to influence the audit process
- Medium Term: Establish an industry-driven oversight body
- Long Term: Establish a database of accredited vendors expanding on both the AC 00-56 database and the OASIS database
 - “Verify and review accreditation certifications, recent audits, and the relevant contact information of key supplier personnel”

ASCIC Results: Verification and Traceability



- Short Term: Shift to digital 8130-3 tags/ Form 1s (using digital authentication)
- Medium Term: establish industry standard documentation requirements (this appears to be for commercial documentation)
- Medium Term: digitize all existing parts documents using OCR
- Medium Term: Create an industry document database that can verify documentation by querying manufacturer and air carriers databases of ARCs to electronically validate the data listed in each field
- Long Term: establish an industry database for BTB documentation of ALL parts including standard parts

ASCIC Results: Non-Serialized Parts Traceability



- Short Term: strengthen training materials and best practices for parts receiving, including recurrent training on current trends
- Short Term: ensuring verification and auditing of scrap material (including mutilation)
- Short Term: clarify roles, responsibilities and timelines for industry for notifying government when SUPs are identified in the supply chain: if reports to government are accelerated then government notices might be accelerated; consider ways to enhance review of government notices
- Long Term: Look at new technologies that can improve traceability, like digital unique identifiers, digital twins, and blockchain



So What is ASA Doing About It?

ASCIC



- The coalition is continuing their work
- There focus will be:
 - Promote Industry Use of Suppliers that Meet FAA and EASA Standards
 - Establish Feedback Loop Between Parts Installers and Accreditors
 - Expand Use of Digital ARCs and Digital Authentication Tools
 - Further Strengthen Training Materials, Program, and Best Practices
 - Verification and Auditing of Scrap Materials and Recycling Vendors
- ASA has been in communication with the leaders of the Coalition and will participate in their future meetings

ASA Responses – Documentation Recognition



- ASA immediately reminded members about our existing training materials
- ASA has been increasing training on documentation and parts approval
- ASA has been working with governments on ways to better standardize global documentation standards
- Monday 1:30 pm: Workshop 3: Approved Parts and Their Documentation (Dickstein)
- Monday 3:30 pm: Workshop 11: All About the ASA Statement Form and the Revised ATA Spec 106 (Resto)
- Tuesday 10:45 am: Workshop 16: LLP Working Group (Chaput)

ASA/AFRA Responses – Accreditation Standards



- ASA has been actively improving its standard (ASA-100)
 - Many ASCIC priorities are being implemented through ASA-100
 - ASA is also asking for some of the identified improvements to be added to AC 00-56C
- ASA has been working to support member quality system excellence
- AFRA has been focused on improving its own standard (AFRA BMP)
- Monday 1:30 pm: Workshop 4: ASA-100 and AC 00-56 Updates and Improvements (Dickstein / O'Connor)
- Monday 3:30 pm: Workshop 9: Product Recall Protocols in Aviation Distribution (Meyer / O'Connor)
- Tuesday 1:30 pm: Workshop 20: AFRA BMP 5.1 What is New (Resto / Lyon / Siena)



ASA Responses – Quality Auditing

- ASA has also continued its focus on quality system and auditing training
- ASA has been focused on training its staff
 - Maintaining the most qualified auditing staff in the industry
- Monday 1:30 pm: Workshop 1: Leveraging Lean (Lussier)
- Tuesday 10:45 am: Workshop 13: Internal Audit (Part 1) (Parsons)
- Tuesday 1:30 pm: Workshop 18: Internal Audit (Part 2) (Parsons)



ASA/AFRA and Digital Documentation

- ASA has been working with FAA, EASA, Transport Canada and ANAC (Brazil) on identifying and reducing regulatory/policy impediments to digitization
 - We are trying to make sure that the path is clear for new solutions
- AFRA is developing a database for removed aircraft parts
- Monday 1:30 pm: Workshop 6: Digital Technology, Parts Provenance and Records Platform (Reed)
- Monday 3:30 pm: Workshop 12: Digital Passports for Assets and Parts (Siena)
- Tuesday 1:30 pm: Workshop 19: Unlocking The Power of AI (Lee)

ASA Continues to Develop and Implement Solutions

- ASA continues to work on related issues like:
 - Clarity in documentation standards
 - Digital documentation
 - Training
 - Compliance support





Documentation Case Studies

Jason Dickstein



Case Study #1

- The purchase order stated:
 - “All material supplied against this Purchase Order must have a signed certificate of conformance indicating that the material was produced under an FAA-approved production quality system, and that it conforms with FAA approved data”
- The manufacturer stated that the parts were designed by [a well-known OEM] and certified their compliance to a National Stock Number
 - No other certification nor documentation was provided



Case Study #1

- Reference to FAA standards suggests that the parts are intended for installation on aircraft subject to FAA jurisdiction
- 14 C.F.R. § 21.9 requires that when a replacement part is reasonably likely to be installed on a type-certificated product, it must be produced under one of the FAA's permitted criteria.
 - The parts in this case were not produced under an FAA production approval
 - A national stock number is not a standard
- There was no effective means of compliance – the parts violated 14 C.F.R. § 21.9



Case Study #2

- A manufacturer produced O-Rings
 - The IPC references the milspec
 - The C of C certified conformity to an NSN and to a milspec
 - The milspec was issued in 1976 and cancelled in 2002 (with a reference to a replacement)
 - The replacement spec was cancelled in 2015
- Are these unapproved parts?
 - Can an ASA-100 accredited company receive these parts?



Case Study #2

- Are these unapproved parts?
- Can an ASA-100 accredited company receive these parts?
- **These are not FAA-approved parts.** Whether these violated 21.9 may depend on evidence of the manufacturer's knowledge about the ultimate use of the parts
- The parts did not fit into any of the FAA criteria from the table in AC 00-56B



EASA Complaint About Standard Parts

- Milspec parts producers used to be audited under DLA standards
 - This was discontinued when DLA started cancelling milspecs
- EASA points out that the U.S. no longer has an effective system for oversight of standard parts
- We rely on the standard parts producers' C of Cs
- It is an outstanding issue to examine how the standard parts system can be improved to provide a higher level of assurance
- ASA members may want to perform their own due diligence of standard parts producers from whom they plan to buy



Tips

- When ordering parts, make your intent clear:
 - “All parts must be produced under an FAA-approved production quality system or other FAA-approved system”
 - *Don’t use this for non-FAA approved parts, like standard parts*
 - “All parts must bear evidence of having been produced in accordance with 14 C.F.R. 21.9(a).”
- **Approved:** “means approved by the FAA or any person to whom the FAA has delegated its authority in the matter concerned, or approved under the provisions of a bilateral agreement between the United States and a foreign country or jurisdiction.” 14 C.F.R. § 1.1.



Tips

- When receiving parts, confirm:
 - The parts meet your purchase order expectations
 - The parts match a category from the AC 00-56B documentation matrix
 - The parts documentation matches the expectations from the AC 00-56B documentation matrix



Concerns Identified During Audits

Sam O'Connor & Michele Dickstein

Concerns



- Only visual inspection of As Removed Parts being performed and remaining requirements of ASA-100 section 6.0 being performed/deferred to a point after receiving inspection.
- An increase in organizations seeking initial accreditation to ASA-100 which hold an AS9120B or ISO9001:2015 certification have not addressed the gap requirements of ASA-100.
- Identified 8130's with errors are being destroyed after the updated/corrected 8130 has been received.
- The Purchase of parts, seeing an increase of parts (standard parts) being purchased and sold where the accredited organization is not determining/confirming how the part was approved.

Concerns



- How an organization reconciles split batches/lots not performed per defined procedures.
- Organizations are making strategic decisions relating to part storage, which is allowed but must be disclosed to ASA.
- Notification not being made to ASA by the accredited organization when they make a major change to their approved quality system.
- Training of personnel versus competence of personnel

Training versus Competence

- Define training and competence.
- Understand key differences.
- Explore how training supports competence.
- Learn how to assess and build competence.
- Apply the concepts in your role.
- Recurrent training.





ASA QA Committee

REMINDERS:

REMINDERS:

***Ability to
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FAA Unapproved Parts Notifications (UPN)

UPNs are ordered by year posted and not by SUP case year.

[2025](#) | [2024](#) | [2023](#) | [2022](#) | [2021](#) | [2020](#)

[2019](#) | [2018](#) | [2017](#) | [2016](#) | [2015](#) | [2014](#) | [2013](#) | [2012](#) | [2011](#) | [2010](#)

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[1999](#) | [1998](#) | [1997](#) | [1996](#)

[Subscribe to Unapproved Parts Notifications via email.](#)

References

- [Parts Manufacturer Approval \(PMA\) List](#)
- [FAA Form 8120-11, SUP Report](#)

Last updated: Wednesday, February 19, 2025

<https://www.faa.gov/aircraft/safety/programs/sups/upn>



ASA QA Committee

REMINDERS:

REMINDERS:

Ability to research 145s is back

AVInfo Find a Facility Dashboard

Click on Repair Station, Training Center, Pilot School, or Mechanics School to get facility location information. If your facility information is incorrect, please [contact your local FSDO](#).

FIND A PART 145 REPAIR STATION

Reset All Filters

Select a Location Type

Click on Repair Station, Training Center, Pilot or Mechanics School.

**PART 145
REPAIR
STATION**

**PART 142
TRAINING
CENTER**

**PART 141
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SCHOOL**

**PART 147
MECHANICS
SCHOOL**

Click to Change Search Type

Proximity to Airport

Enter a US Zip Code

Select a Distance

Select a Distance Type

Or use filters below

Part 145 Repair Station	Rating		
Partial Name or Certificate Number <input type="text"/> Continent <input type="text" value="(All)"/> Country <input type="text" value="(All)"/> State <input type="text" value="(All)"/> City <input type="text" value="(All)"/>	Accessory Rating <input checked="" type="checkbox"/> Class 1 <input checked="" type="checkbox"/> Class 2 <input checked="" type="checkbox"/> Class 3 <input checked="" type="checkbox"/> Limited <input checked="" type="checkbox"/> Not Authorized Airframe Rating <input checked="" type="checkbox"/> Class 1 <input checked="" type="checkbox"/> Class 2 <input checked="" type="checkbox"/> Class 3 <input checked="" type="checkbox"/> Class 4 <input checked="" type="checkbox"/> Limited <input checked="" type="checkbox"/> Not Authorized Bilateral Agreement <input checked="" type="checkbox"/> Brazil <input checked="" type="checkbox"/> EASA <input checked="" type="checkbox"/> Singapore <input checked="" type="checkbox"/> TCCA (Canada) <input checked="" type="checkbox"/> United Kingdom <input checked="" type="checkbox"/> No Agreements	Limited Rating <input checked="" type="checkbox"/> Aircraft/Fabric <input checked="" type="checkbox"/> Equipment <input checked="" type="checkbox"/> Floats <input checked="" type="checkbox"/> LandingGear <input checked="" type="checkbox"/> NonDestructiveTst <input checked="" type="checkbox"/> RotorBlades <input checked="" type="checkbox"/> SpecializedService <input checked="" type="checkbox"/> Not Authorized Instrument Rating <input checked="" type="checkbox"/> Class 1 <input checked="" type="checkbox"/> Class 2 <input checked="" type="checkbox"/> Class 3 <input checked="" type="checkbox"/> Class 4 <input checked="" type="checkbox"/> Limited <input checked="" type="checkbox"/> Not Authorized	Powerplant Rating <input checked="" type="checkbox"/> Class 1 <input checked="" type="checkbox"/> Class 2 <input checked="" type="checkbox"/> Class 3 <input checked="" type="checkbox"/> Limited <input checked="" type="checkbox"/> Not Authorized Propeller Rating <input checked="" type="checkbox"/> Class 1 <input checked="" type="checkbox"/> Class 2 <input checked="" type="checkbox"/> Limited <input checked="" type="checkbox"/> Not Authorized Radio Rating <input checked="" type="checkbox"/> Class 1 <input checked="" type="checkbox"/> Class 2 <input checked="" type="checkbox"/> Class 3 <input checked="" type="checkbox"/> Limited <input checked="" type="checkbox"/> Not Authorized



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5,799
REPAIR STATION
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ASA QA Committee

AND FINALLY!:

Air Operator FAR Search

This search includes FAR Parts 91, 121, 125, 129, 133, 135, and 137. Click on a FAR part number below to see certificated air operators. Check "Show Aircraft" to view aircraft make, model, and series. If your air operator information is incorrect, please [contact your local FSDO](#).

Ability to research 129s is back!

Air Operator FAR 129

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91 121 125 **129** 133 135 137 [Reset Filters](#)

0869234 B.C. LTD. d/b/a STREAK AIR Certificate Number: 10BF619F Issue Date: 2021-04-22 Designator Code: 10BF CHIEF EXECUTIVE OFFICER: STRATE, ROBERT 3077 AIRPORT ROAD KAMLOOPS BC CA V2B 7X2	102662 CANADA INC d/b/a EXPRESS AIR Certificate Number: X2DF918F Issue Date: 2000-11-13 Designator Code: X2DF CHIEF EXECUTIVE OFFICER: LACHAPELLE, ROGER 40 BOTELER ST., SUITE 802 OTTAWA ON CA K1N 9C8 DIRECTOR OF OPERATIONS: LACHAPELLE, MARTIN PIC CAPTAINS: 5	138883 CANADA INC d/b/a BLUESTAR AIR SERVICES Certificate Number: C12F595F Issue Date: 2020-10-01 Designator Code: C12F CHIEF EXECUTIVE OFFICER: FIELD, BLAINE TERRY 132 PLEASANT RIDGE ROAD BRANTFORD ON CA N3R 0B8 DIRECTOR OF OPERATIONS: CLARKE, FREDERICK ERNEST DIRECTOR OF MAINTENANCE: FIELD, BLAINE TERRY	# A B C D E F G H I J K L ...
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Thank You for your participation!



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