



# **ASA-100 New Revision, 3<sup>rd</sup> Party Logistics (3PL) and FAA AC 00-56 Update**

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# Definition – New Concept

Delegated Quality Provider (“DQP”): A party other than the Distributor that performs a function that is part of the Distributor’s Quality System. DQPs are part of the Distributor’s Quality System; therefore, they need to be managed by the Distributor as part of the Quality System. DQPs are also subject to auditing under the AC 00-56 program. A DQP is a Supplier to the Distributor, but Suppliers need not be DQPs.

## **DEFINITION – NEW, BASED ON FAA DEFINITION BUT TAILORED TO DISTRIBUTION**

Supplier: A person at any tier in the supply chain who provides a product, article, or service that is used or consumed in the distribution of a product or article. For the purpose of this standard, this includes Delegated Quality Providers.



# DEFINITION – ADDED YELLOW HIGHLIGHT FOR CLARIFICATION

Drop Shipment: A Drop Shipment occurs when a distributor causes an article to be shipped from the distributor's supplier to the distributor's customer. A Drop Shipment is not inherently a delegation of a quality system function, so long as the distributor ensures the transaction meets the requirements of the distributor's quality system.

# DEFINITION – COMMON LEGAL DEFINITION

Person: An individual, firm, partnership, corporation, company, association, joint-stock association, or governmental entity. It includes a trustee, receiver, assignee, or similar representative of any of them.



# ADDED NEW SECTION 1. E 17)

## 1. Quality System and Quality Manual

E. For distributors, the quality control manual shall include, but not be limited to a detailed description of:

17) the system for controlling Delegated Quality Provider(s) who perform Quality System functions on behalf of the Distributor, if applicable.



# New 5A and Delete Current 5C

## 5. Procurement

A. The distributor's quality system shall:

- 1) Maintain a list or database of approved suppliers.
- 2) Maintain a quality history on each approved supplier and describe the process for reviewing that information to determine if any action shall be taken.
- 3) Describe the criteria for supplier approval.
- 4) Describe the process for supplier approval.
- 5) Identify if the supplier is a Delegated Quality Provider and describe each of the distributor's accredited functions that have been delegated to that Delegated Quality Provider

~~C. The distributor shall maintain a list of its approved suppliers and a quality history for each approved supplier. The distributor shall describe the criteria for supplier approval.~~



## Section 6E – REMOVED AT PRIOR MEETING

### 6. Receiving Inspection

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



# NEW SECTION 16. Delegating Quality System Functions to Delegated Quality Providers

## 16. Delegating Quality System Functions to Delegated Quality Providers

A distributor may delegate a quality system function that is required under ASA-100 or under AC 00-56 to a Delegated Quality Provider, if and only if each of the following requirements are met:

- A. The quality system shall include a written process describing how the distributor communicates the distributor's quality system requirements to the Delegated Quality Provider
- B. The quality system shall include a written process describing how the distributor confirms that the Delegated Quality Provider is following the distributor's quality system requirements.
  - 1. This process must include a mechanism providing the Distributor, ASA, and regulatory authorities the right of access to applicable areas of facilities and to applicable records received by and/or created by the Delegated Quality Provider as an agent of the Distributor.



# NEW SECTION 16.

## Delegating Quality System Functions to Delegated Quality Providers

C. The distributor's internal audit procedure and records shall demonstrate that the distributor has followed the written processes as they apply to the Delegated Quality Provider.

D. The initial contracting of a quality system function to a Delegated Quality Provider, or a change in the way a quality system function is contracted to a Delegated Quality Provider, is considered a significant change to the Distributor's quality system and requires the Distributor to notify ASA prior to implementing the significant change (in some cases, this may trigger a special audit).

- 1. If a quality system **urgent need** requires the immediate removal of a contracted function from a Delegated Quality Provider, then this may be accomplished prior to notification of ASA; however, notification must be accomplished promptly, and the function may not be once again contracted to a Delegated Quality Provider except in accordance with the other subparagraphs of this section 16



# Timeline for Release and Transition

New Revision will be released on 10/1/2025

- Update existing supporting documents
  - Quality Manual Template
  - Audit Checklist for use by accredited organizations
  - Update of ASA auditing documents
- Creation of training material

New Accreditation Audits and Existing Accreditation Audits

- As of 10/1/2025 all new initial accreditation audits will be to the new revision
- Between 10/1/2025 and 4/1/2026 existing accredited clients may be audited to rev 5.0
- After 4/1/2026 all audits will be to the new revision.



# 3PL in Aviation



# Introduction to 3PL

- Definition: Third-Party Logistics (3PL) involves outsourcing logistics operations to external providers.
- Purpose in Aviation: Streamlines supply chain operations for airlines, MROs, and OEMs.



# Key Functions of 3PL in Aviation

- Inventory Management
- Warehousing & Distribution
- Transportation & Freight
- AOG (Aircraft on Ground) Support
- Reverse Logistics



# Inventory Management

- Track & store aircraft parts/components
- Avoid AOG with optimized stock levels
- Serialized parts traceability



# Warehousing & Distribution

- Strategic warehouse locations
- Handling of critical vs. non-critical parts
- Efficient distribution models



# Transportation & Freight

- Time-sensitive shipping
- Customs and regulatory compliance
- Domestic & international freight



# AOG Support

- 24/7 logistics availability
- Rapid response to grounded aircraft
- Critical to operational uptime



# Reverse Logistics

- Core returns & part repairs
- Traceability for regulated items
- Efficient return flow processes



# Benefits of 3PL in Aviation

- Cost Efficiency
- Scalability
- Specialized Expertise
- Speed & Responsiveness
- Advanced Technology Use



# Major 3PL Providers in Aviation

- DB Schenker (Schenker Aerospace)
- Kuehne + Nagel
- Expeditors International
- Bolloré Logistics
- Unical 3PL Services
- B&H Aero



# Challenges in Aviation 3PL

- Regulatory compliance (FAA, EASA, ITAR)
- Serialized parts management
- High-value item handling
- Unpredictable demand
- Systems integration with clients



# 3PL vs. 4PL in Aviation

- Feature: 3PL / 4PL
- Role:       **3PL** Executes logistics operations **4PL** Manages supply chain strategy
- Control:   **3PL** Shared with client **4PL** High-level oversight
- Focus:      **3PL** Operational efficiency **4PL** End-to-end optimization



# Conclusion

- 3PL is critical for modern aviation logistics
- Enhances efficiency, speed, and compliance
- Strategic partnerships with 3PLs enable growth and resilience



# ASA-100 and 3PL's

## 3PL's

- A. Seek accreditation to ASA-100 or,
- B. Accredited ASA-100 organizations contract with a 3PL and delegate part of their quality system performance.



# 3PL becomes directly accredited

ASA-100 applicability.

- Section 1: Quality System and Manual
- Section 2: Self-audit/Evaluation & Accreditation Program
- Section 3: Facilities
- Section 4: Training and Authorized Personnel
- **Section 5: Procurement**
- Section 6: Receiving Inspection
- **Section 7: Measuring and Testing Equipment**
- Section 8: Material Control



# 3PL becomes accredited

ASA-100 applicability.

- Section 9: Shelf-Life Control
- **Section 10: Certification and Release of Materials**
- Section 11: Shipping
- Section 12: Records
- **Section 13: Technical Data Control**
- Section 14: Corrective Action
- Section 15: Hazmat Control and Transport



# Delegated Quality System Requirements to a 3PL providing

ASA-100 applicability.

- Section 1: Quality System and Manual
- Section 2: Self-audit/Evaluation & Accreditation Program
- Section 3: Facilities
- Section 4: Training and Authorized Personnel
- Section 5: Procurement
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# AC 00-56 Update

FAA is working on AC 00-56C

During the June 2024 QC Summer Meeting ASA created a subcommittee to review the current AC 00-56 revision and make recommendations for improvements to be presented to the FAA.

- Chair – Ron Wolf
- Team Representation:

| CFM Materials           | Aircraft Inventory Management Services |
|-------------------------|--|
| Aersale                 | MidAmerican                            |
| Delta Material Services | Avair                                  |
| VSE Aviation            | Magellan                               |
| Beach Aviation          | Aerfin                                 |
| Mercury Trading         | ASA                                    |



# 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.~~

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# 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 19<sup>th</sup> 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 20<sup>th</sup> 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 00-56 Update

ASA presented in December 2024 the recommendations from the subcommittee to the FAA. The subcommittee did inform ASA that there were more recommendations, and it has been confirmed that these may be presented to them during the public review and comments phase.

The FAA notified ASA on May 30, 2025, that they have not defined a time frame for release of AC 00-56 for public comment.

ASA will provide updates when the FAA defines its release for comment timeline.



# Thank You

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