

Committee Updates for Guidance Material and Best Practices for Life-Limited Parts

03-JUNE-2025

Aviation Suppliers Association

FT Lauderdale, FL

Mission:

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

Scope:

- Update on the Committee's review.
- IATA Meeting.
- Committee reconvening.
- Bring possible solutions to the table for discussion.

Timeline:

- Weekly meetings via TEAMs.
- Draft verbiage to be presented to the QC Leadership by 21-July-2025.
- Final Draft to be presented to ASA President and Counsel by 23-July-2025.
- Final to be delivered to IATA in September 2025.

Committee Review:

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

Highlights of Changes:

- **Cleaned up verbiage to be clear and concise.**
- **Expanded on Abbreviations and deleted ones that did not pertain to documentation.**
- **Highlighted that the document is meant to be GOING FORWARD as of 30-December-2020.**

Overview of Changes:

Current

Abbreviations

A	
AC	Advisory Circular
ACMI	Aircraft, Crew, Maintenance and Insurance
AD	Airworthiness Directive
AIR	Aircraft Inspection Report
ALS	Airworthiness Limitations Section
AMC	Acceptable Means of Compliance
AMM	Aircraft Maintenance Manual
AMOC	Alternate Means of Compliance
AMP	Aircraft Maintenance Program
AOG	Aircraft-On-Ground
APU	Auxiliary Power Unit
AR	Authorized Representative
ARC	Airworthiness Review Certificate
ARL	Aircraft Readiness Log
ASL	Aircraft Serialization Listing
ATC	Air Traffic Control
AWL	Airworthiness Limitation

Revision

Common Aviation Abbreviations

AC	Advisory Circular
ACMI-REG	Aircraft Registration Crew, Maintenance and Insurance
AD	Airworthiness Directive
AIR	Aircraft Inspection Report
ALS	Airworthiness Limitations Section
AMC	Acceptable Means of Compliance
AMM	Aircraft Maintenance Manual
AMO	Approved Maintenance Organization
AMOC	Alternate Means of Compliance
AMP	Aircraft Maintenance Program
AOG	Aircraft-On-Ground
APU	Auxiliary Power Unit
AR	Authorized Representative
ARC	Airworthiness Review Certificate
ARL	Aircraft Readiness Log
ASL	Aircraft Serialization Listing
ATC	Air Traffic Control
ATA	Air Transport Association (Airlines for America)
AWG	Aviation Working Group
AWL	Airworthiness Limitation

Overview of Changes:

• Current

Notes:

- In the document the terms 'Operational History Record' and 'In-service History Record' mean the same and can be read interchangeably.
- As the supporting documentation/paperwork for BtB traceability of LLPs is expected to be captured in an electronic format (in the form of record(s)), as per the guidelines set out in this standard, the terms 'documentation' and 'paperwork' can be read as 'record(s)'.

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• Revision

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- **This document is meant for current activity as of 31-December-2020.**
- It is highly recommended that engine LLPs need to be tracked according to this guidance after the above date.
- However, it can be used as a guideline for due diligence prior to this date with the understanding some of these documents didn't exist at earlier timelines (please see appendix 8.5).

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Overview of Changes:

• Current

1. Need for Establishing Industry Standard of Trace Paperwork for LLPBTB

LLPBTB trace has become a sensitive subject in aviation asset management and, as a consequence, within the airline community.

This is because it affects a lot of different parties within the aviation industry whose interests do not always align, from airlines to lessors, to OEMs, to parts' traders, to MROs to CAMOs.

- The **airline's core business** is to fly aircraft in the most cost-effective way. Although an airline's primary focus is to assure passengers a safe flight, the airline's interest is to reduce its costs. There are several ways to achieve savings. One of them is to reduce parts' cost to the minimum while keeping the assets in acceptable condition to the owner. Another one is to meet certain engine built workscope requirements with specific run times lower than the full life of a new LLP. Hence airlines prefer installing used LLPs, provided they are acceptable to the lessor or to the potential buyer. Considering that the number of leased aircraft is constantly increasing, airlines have to maintain an accurate system for BtB.
- The **lessor's core business** is to lease the asset in the most cost-effective way. Leased assets may be complete aircraft and/or engines but lessors may also lease components that include LLPs like landing gear or APUs. The lessor's interest is to spend as little time and money as possible on transferring the asset and to maximize asset value for later sale. Hence the lessor prefers the use of LLPs that do not present any documentation (trace) issue.
- The **OEM's core business** is to manufacture safe products and to sell parts in the aftermarket, which is the market for spare parts. The OEM's interest is to ensure their products are safe and in compliance with the design regulations, and to maximize sales of new OEM parts. Competition between OEMs to sell new aircraft has never been so intense. Consequently, OEM revenues derived from new products have decreased significantly. At the same time, used parts are now commonly used by airlines and part out companies have flooded the secondary market. Because of these market conditions, the OEMs have been critical of the aftermarket as a matter to counteract their loss of revenues.
- The **parts traders' core business** is to buy used assets at the lowest possible price and sell the piece parts at the highest possible price. Hence their interest is to negotiate a low buying price of used assets (normally purchased from airlines or lessors) while keeping the sales price as high as possible.
- The **MROs' business** is acting on behalf of their customers (mainly airlines and lessors) to ensure that LLPs meet their requirements. In certain cases where MROs provide "power by the hour" type agreements, MROs may have their own commercial interest.
- The **CAMOs' (Part M) business (and equivalent or other EASA following regulatory systems)** is to act on behalf of its customers when it comes to managing the airworthiness of the aircraft; LLPs are an integral part of managing this activity.

• Revision

1. Need for Establishing Industry Standard of Trace Paperwork for LLPBTB

LLPBTB trace has become a sensitive subject in aviation asset management and, as a consequence, within the airline community.

This is because it affects a lot of different parties within the aviation industry whose interests do not always align, from airlines to lessors, to Design Approval Holders (DAH), Production Approval Holders (PAHs), to parts' traders, to MROs to CAMOs.

- The **airline's core business** is to fly aircraft in the most cost-effective way. Although an airline's primary focus is to assure passengers a safe flight, the airline's interest is to reduce its costs. There are several ways to achieve savings. One of them is to reduce parts' cost to the minimum while keeping the assets in acceptable condition to the owner. Another one is to meet certain engine built workscope requirements with specific run times lower than the full life of a new LLP. Hence airlines prefer installing used LLPs, provided they are acceptable to the lessor or to the potential buyer. Considering that the number of leased aircraft is constantly increasing, airlines have to maintain an accurate system for BtB.
- The **lessor's core business** is to lease the asset in the most cost-effective way. Leased assets may be complete aircraft and/or engines but lessors may also lease components that include LLPs. The lessor's interest is to maximize marketability and asset value for later sale.
- The **PAH's core business** is to manufacture safe products and to sell parts in the aftermarket, which is the market for spare parts. The PAH's interest is to ensure their products are safe and in compliance with the design regulations, and to maximize sales.
- The **parts traders' core business** is to support their customer's needs regarding parts support. This includes new and used parts supplied through sale and lease arrangements. Parts Traders' are commonly known as distributors. Many factors impact the saleability of aircraft parts including demand, supply, and condition. Condition of the asset is an important factor in these transactions and this includes (1) protecting the airworthiness of the asset, and (2) obtaining sufficient substantiating records to demonstrate the airworthiness condition of the asset.
- The **MROs' business** is acting on behalf of their customers (mainly airlines and lessors) to ensure that LLPs meet their requirements. In certain cases where MROs provide "power by the hour" type agreements, MROs may have their own commercial interest.
- The **CAMOs' (Part M) business (and equivalent or other EASA following regulatory systems)** is to act on behalf of its customers when it comes to managing the airworthiness of the aircraft; LLPs are an integral part of executing and managing this activity.

Overview of Changes:

• Current

2. Operator Documents

The key document is the host engine LLP status at the time the LLP is exiting from the operator's fleet. LLP status sheets ("disk sheets") are not typically produced by operators at the time of delivery, post shop visits or at movement from one aircraft to another within that operator's fleet and, therefore, operator-produced LLP status sheets should only be required at the conclusion of operation of the engine (or a particular LLP if traded separately) by each operator.

...The operational history is required to catalogue the full operation of the LLP from when it was inducted into an operator's fleet (at which time an LLP status is provided to the current operator by the previous operator) to the point that it leaves the fleet (at which time an updated LLP status is issued by the latest operator). Providing this operational history in conjunction with an LLP status ensures full disclosure of the LLP's history with that operator and records sufficient information that may be needed in the future.

• Revision

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The key document is the host engine LLP status at the time the LLP is exiting from the operator's fleet. **LLP status sheets ("disk sheets") are not typically produced by operators at the time of delivery**, post shop visits or at movement from one aircraft to another within that operator's fleet and, therefore, operator-produced LLP status sheets should only be required at the conclusion of operation of the engine (or a particular LLP if traded separately) by each operator.

...The operational history is required to catalogue the full operation of the LLP from when it was inducted into an operator's fleet **(at which time an LLP status is provided to the current operator by the previous operator) to the point that it leaves the fleet (at which time an updated LLP status is issued by the latest operator)**. Providing this operational history in conjunction with an LLP status ensures full disclosure of the LLP's history with that operator and records sufficient information that may be needed in the future.

Overview of Changes:

- **Current**

- 7. Documentation Dates

Not all technical documentation for a particular event can be issued on the same date, nor does it need to be.

- **Revision**

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Overview of Proposed Additions:

- Current – N/A

- Revision

16.5 Appendix 5 ~~Time Frame of Statements~~ Time Milestone Expectation for Potential Introduction of Voluntary Statements

These voluntary statements became available under the following time frame. Do not seek a voluntary document before it existed.

1. IACS Statement with current verbiage
 - a. Introduced in 2014 (reference page 52 of this document)
2. NIS Statements
 - a. Around 1998 it started to be requested for engines and/or engine components.
 - b. After 31Dec 2020, NIS is not required; superseded by IACS
3. Statements in response to Service Bulletins, e.g. fuel from the Commonwealth of Independent States (CIS)Fuel and Harsh Statements
 - a. Service Bulletin requirements should be met for these items as applicable to engine type and SB directives.
 - b. Until an Airworthy Directive is published, service bulletins are not regulatorily mandated.
4. PMA/DER Statements are not required and were not commonplace prior to 2014. They may apply for critical influencing parts (CIPs) for CFM/GE engines only.
5. Non-Operating/Storage Statements became prevalent during the COVID era. They were requested to cover the gaps of storage during the global shut down. These statements should not be expected prior to that time frame.

IATA Meeting March 2025:

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

Committee reconvened:

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

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

- Keeping to the same format as engine LLP section.
- Add common terminology section.
- Add Templates to Landing Gear.
- Add Figures.
- Add Tables.

Landing Gear and Auxiliary Power Units (APU)

Notes:

- In the document the terms 'Operational History Record' and 'In-service History Record' mean the same and can be read interchangeably. For landing gear, this can also be called Parts Movement Traceability Sheet (PMTS) or Movement Traceability Sheet (MTS).
- As the supporting documentation/paperwork for BtB traceability of LLPs is expected to be captured in an electronic format (in the form of record(s)), as per the guidelines set out in this standard, the terms 'documentation' and 'paperwork' can be read as 'record(s)'.
- **This document is meant for current activity as of XX-Month-YEAR .**
- It is highly recommended that Landing Gear LLPs need to be tracked according to this guidance after the above date.
- Most examples will be referring to Airbus or Boeing within this document and will be labeled as such.
- However, it can be used as a guideline for due diligence prior to this date with the understanding some of these documents didn't exist at earlier timelines (please see [appendix 16.5](#)).

Add common terminology matrix within the appendix; reference here.

7. Documentation Required to Establish Life-Limited Part's (LLPs) Back-to-Birth (BtB) Traceability



- 1. Birth Documents
- 2. Operator Documents
- 3. Shop Visit Documents
- Supporting documents and scenarios
- Document Structure Figure
- Supporting Documentation Schematic
- History Templates

Overview of Changes:

- **Current**

8.4 Appendix 4 – LLP Back-to-Birth (BtB) Records Trace Template

- **Revision**

16.4 Appendix 4 – LLP Back-to-Birth (BtB) Records Trace Template

Add Landing Gear Template

Add APU Template

Overview of Proposed Additions:

- **Current N/A**

- **Revision**

16.5 Appendix 5:
Time Milestone Expectation for Potential Introduction of
Voluntary Statements

16.6
Common Terminology Matrix

16.7 Glossary

Questions?

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