Approved Parts and Their Documentation

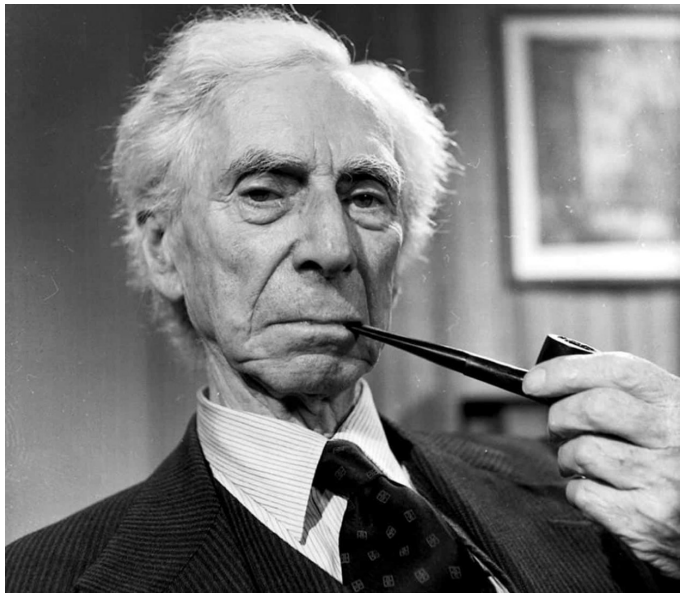
ASA/AFRA Annual Conference

June 2, 2025

The fact that an opinion has been widely held, is no evidence whatever that is is not utterly absurd

Bertrand Russell:

20th century philosopher, logician and mathematician



Documentation is Evidence of Facts

Airworthiness Documentation

Declares Regulated Facts, e.g.:

- A part was produced under an approved system (FAA)
- A part was released from an approved system (EASA)
- A part was released following maintenance or alteration by a certificate holder (FAA & EASA)

Commercial Documentation

Declares commercially valuable information, e.g.:

- Identity
- Condition
- Quantity
- Warranty information
- *Other commercial information*

Some Initial Caveats

- Commercial documentation norms are constantly changing because they are driven by commercial concerns
- Airworthiness documentation requirements change less frequently
- Commercial requests for specific types of documentation can impact the airworthiness documentation that is requested, even if the rules did not change
- We will talk about what is <u>required</u> and what is <u>often requested</u>

- … But first, let's talk about the underlying facts that are being documented …

General Rule of Aircraft Parts Manufacturing

- Generally, parts manufacturers need government approval to produce parts in most jurisdictions
  - PC, POA, PMA, TSOA, etc.
- As with all general rules, there are (many) exceptions

FAA Definition of “Approved”

- FAA: *Approved* means:
  - Approved by the FAA or
  - Approved by 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

What are Approved Parts Under the FAA System?

- Generally, this means that the part has been produced under government approval:
  - Design Approval
    - Applicant demonstrates to the government that the design meets all government requirements including airworthiness requirements
  - Production Approval
    - Applicant demonstrates to the government that the production quality assurance system will effectively produce products and/or parts that meet the requirements of the approved design

Airworthiness v. Approved

- Airworthiness generally means:
  - Conforms to the airworthiness conditions of the aviation-authority (e.g. FAA) approved configuration and
  - Is in a condition for safe operation
- An airworthy part can become un-airworthy through damage or degradation

- Aviation Authorities approve <u>design</u> and <u>production</u> systems for aircraft articles
- An approved part can become un-airworthy through damage or degradation … but it is usually still “approved”

Approved Parts: FAA Regulatory Standards

- 14 C.F.R. § 21.9 (a) If a person knows, or should know, that a replacement or modification article is reasonably likely to be installed on a type-certificated product, <u>the person may not produce that article</u> unless it is—

  (1) Produced under a type certificate;

  (2) Produced under an FAA production approval;

  PC, PMA or TSOA

  (3) A standard part (such as a nut or bolt) manufactured in compliance with a government or established industry specification;

  (4) A commercial part as defined in §21.1 of this part;

  (5) Produced by an owner or operator for maintaining or altering that owner or operator's product; or

  (6) Fabricated by an appropriately rated certificate holder with a quality system, and consumed in the repair or alteration of a product or article in accordance with part 43 of this chapter; or

  (7) Produced in any other manner approved by the FAA.

Approved Parts: Representations (*Limits on the Documentation*)

- 14 C.F.R. § 21.9(b) Except as provided in paragraphs (a)(1) through (a)(2) of this section, a person who produces a replacement or modification article for sale may not represent that part as suitable for installation on a type-certificated product.

(a) (1) Produced under a type certificate;

(a) (2) Produced under an FAA production approval;

Categories of FAA “Approved” and “Acceptable” Parts

- PMA
- TSOA
- TC only (incl. prepositioned parts)
- PC (incl. Direct Ship Authorization)
- Bilateral Agreement
- 21.8(d)
- Standard Parts
- Owner/Operator Produced Parts
- Repair Station Produced Parts and other Maintenance-Produced Parts

Approved Parts (*from the US*)

- Production Certificate (PC)*
- Certifies that the production quality assurance system will effectively assure that each <u>product</u> released from the system will meet the requirements of the approved design
- May be used for a complete Type Certificated product (aircraft, engine, propeller) <u>or for the component parts of the product</u>

* = Parts acceptable in other countries under most US bilateral agreements

More Categories of Approved Parts

- Parts Manufacturer Approval (PMA)*
  - Used to approve replacement and modification aircraft parts
  - A hybrid approval in that both design and production are approved in a single document
- Technical Standard Order Authorization (TSOA)*
  - The government issues a Technical Standard Order (TSO)
    - The TSO sets performance standards
  - The applicant demonstrates compliance to the standards found in the TSO
  - US, EU and Canada harmonized their TSOs and changed from a TSOA validation model to a mutual acceptance model!

* = Parts acceptable in other countries under most US bilateral agreements

More Categories of Approved Parts

- Parts Manufacturer Approval (PMA)*

Verify PMAs at
https://drs.faa.gov/browse/PMA/doctypeDetails

- Technical Standard Order Authorization (TSOA)*

Verify TSOAs at
https://drs.faa.gov/browse/TSOI/doctypeDetails

* = Parts acceptable in other countries under most US bilateral agreements

Optional Documentation *(from an FAA regulatory standpoint)*

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: ☐ Approved design data and are in a condition for safe operation. ☐ Non-approved design data specified in Block 12.		14a. ☐ 14 CFR 43.9 Return to Service ☐ 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

It is important to understand that the existence of this document alone does not automatically constitute authority to install the aircraft engine/propeller/article.

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.

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.

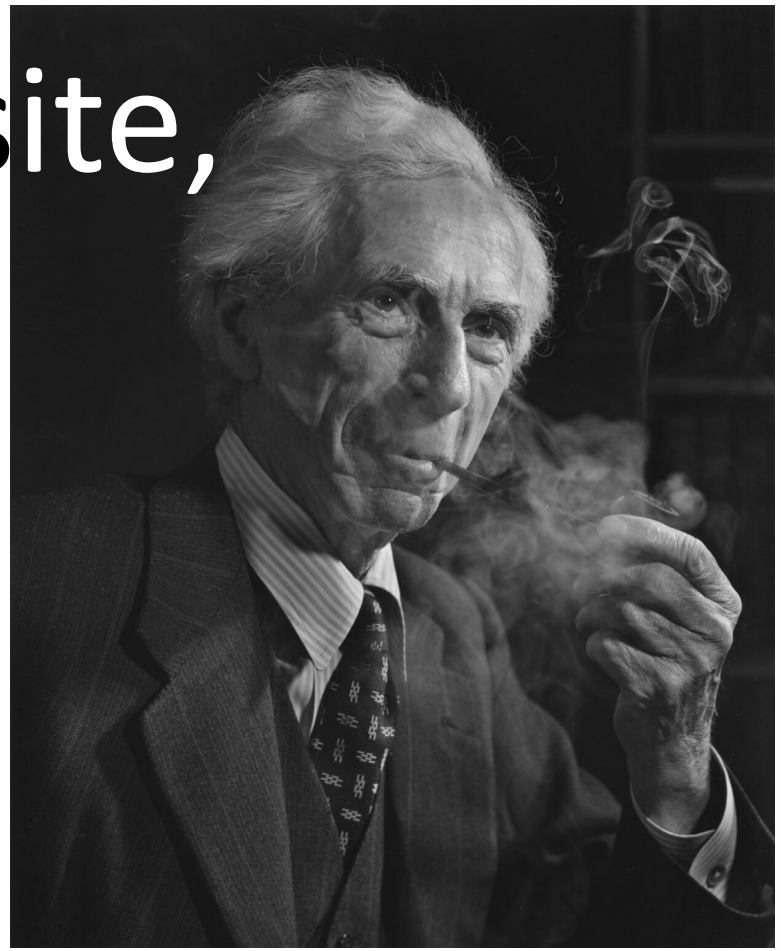
FAA Form 8130–3 (02–14) NSN: 0052-00-012-9005

- Production approval holders may obtain 8130-3 for their new, airworthy aircraft parts from the FAA
  - DAR-F, DMIR, ODA
- Production approval holders may issue 8130-3 for their new, airworthy aircraft parts
  - 14 C.F.R. § 21.137(o)
  - Must have an acceptable system
- **8130-3 tags for new parts are strongly encouraged by the FAA**

8130-3 Tags - Sources

- Because the 8130-3 Tag is technically "optional" it doesn't *always* exist for every part
  - Even though "optional," the documentation is viewed as valuable
- Distributors frequently obtain 8130-3 tags from the FAA
  - FAA operates through its designees, so actual FAA signatories tend to be DARs
- Manufacturers have been increasingly issuing 8130-3 tags themselves
  - Historically this was done through DMIRs, DARs or ODAs
  - Current *trend* is to rely on the FAA production approval authority (14 C.F.R. § 21.137(o))
  - These can be thought of as "birth records"

OUR knowledge of truths, unlike our knowledge of things, has an opposite, namely *error*.



Bertrand Russell:

20th century philosopher, logician and mathematician

AOG Technics – A Reason to Pay Attention to Documentation …

EASA European Union Aviation Safety Agency | EASA Pro | Search | Apps | Login | Register

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- Aircraft & products home
- Aircraft certification
- Airworthiness Directives
- Alternative Procedures to Design Organisation Approval (ADOA)
- Continuing Airworthiness Organisations
- Design Organisations
- Ageing Aircraft Structures
- ETSO
- International Maintenance Review Board Policy Board (IMRBPB)
- Manufacturer Scheduled Maintenance Requirements
- Permit to fly
- Production Organisations Approvals
- **Suspected Unapproved Parts**
  - Background
- News

Home / Domains / Aircraft & products / Suspected Unapproved Parts / Aircraft Parts Distributed by AOG Technics

Aircraft Parts Distributed by AOG Technics

Publication Date: 04/08/2023 | **Date Reported to EASA:** 04/08/2023 | **EASA reference:** OC-EASA-2023004901 | **Case type:** SUP ca

Suspected Unapproved Parts Details

Product: CFM56 Engine
Part name: Multiple
Part Number: Multiple
Serial Number: Multiple

This EASA Suspected Unapproved parts (SUP) notification is issued to alert owne distributors of suspected unapproved parts distributed by AOG Technics, (Nova N United Kingdom).

Occurrence reports have been submitted to the European Union Aviation Safety Ager engine parts distributed by AOG Technics have been supplied with a falsified Authorize confirmed example, the approved organisation, identified on the ARC, has attested that their organisation, and the certificate has been falsified.

FAA Aviation Safety

UNAPPROVED PARTS NOTIFICATION
Aircraft Certification Service

No.: 2023- AAE-EHL-20230801-713
Date: 9/21/2023
http://www.faa.gov/aircraft/safety/programs/sups/upn

AFFECTED PRODUCTS
General Electric Company (GE) bushing part number 1856M94P01 sold by AOG Technics LTD to TAP Maintenance & Engineering.

…ral CFM56
…cate (ARC). In each
…orm did not originate from within

Issues Identified in AOG Technics Documentation

- Some documentation was identified as altered versions of EASA Form 1 (*some 8130-3 tags were later identified as well*)
  - Form tracking, work order, and other identifying numbers were changed
  - Source ESNs were changed
  - Dates were changed
  - Quantities were changed
- All of this appears to have been intended to make the misleading forms more difficult to track
  - Careful review of documentation can help keep the aviation system safer
  - Always compare it to the part!!

Check the Documentation When You Receive It

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: ☐ Approved design data and are in a condition for safe operation. ☐ Non-approved design data specified in Block 12.		14a. ☐ 14 CFR 43.9 Return to Service ☐ 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

It is important to understand that the existence of this document alone does not automatically constitute authority to install the aircraft engine/propeller/article.

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.

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.

FAA Form 8130–3 (02–14) NSN: 0052-00-012-9005

- Correlate the form to your purchase order
- Make sure the authority in block 1 is acceptable
- Make sure the form meets your purchase order expectations
- Make sure blocks 7-12 match the part that you receive
- Make sure the signature block reflects your expectations

Is it Signed by an FAA Designee?

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:

☐ Approved design data and are in a condition for safe operation.
☐ Non-approved design data specified in Block 12.

14a. ☐ 14 CFR 43.9 Return to Service ☐ 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.: DARF, DART, DMIR	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

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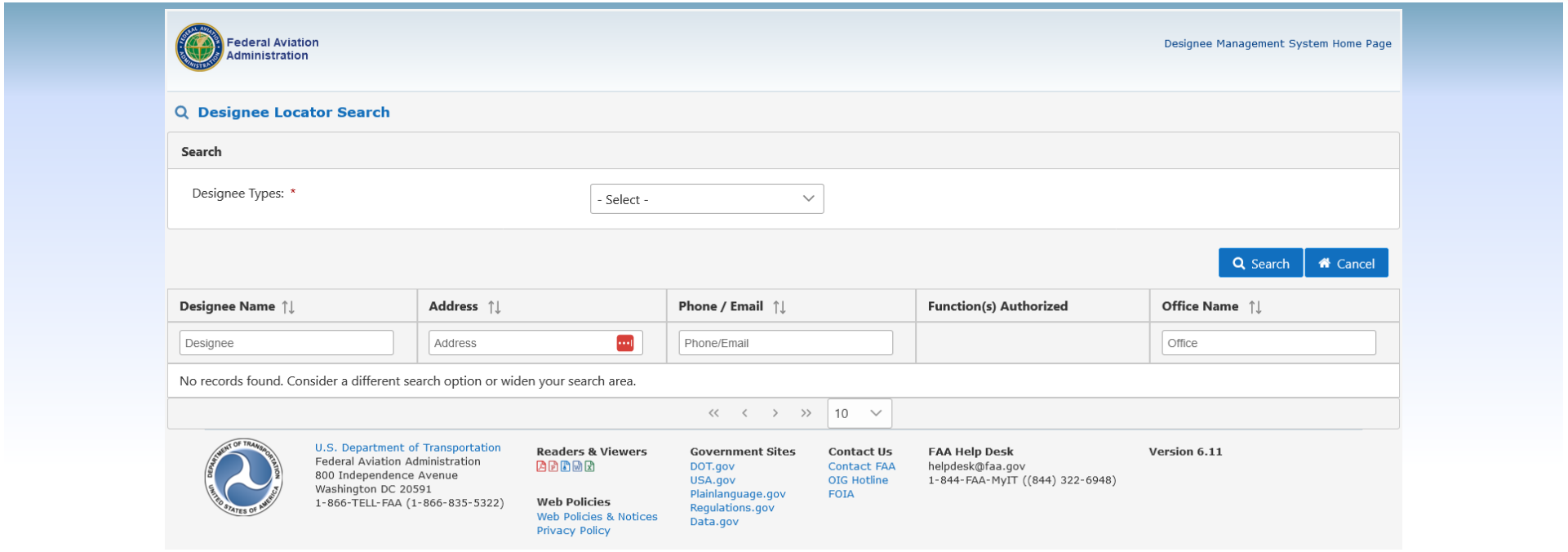
Statements in Blocks 13a and 14a do not constitute installation certification. In all cases, aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown.

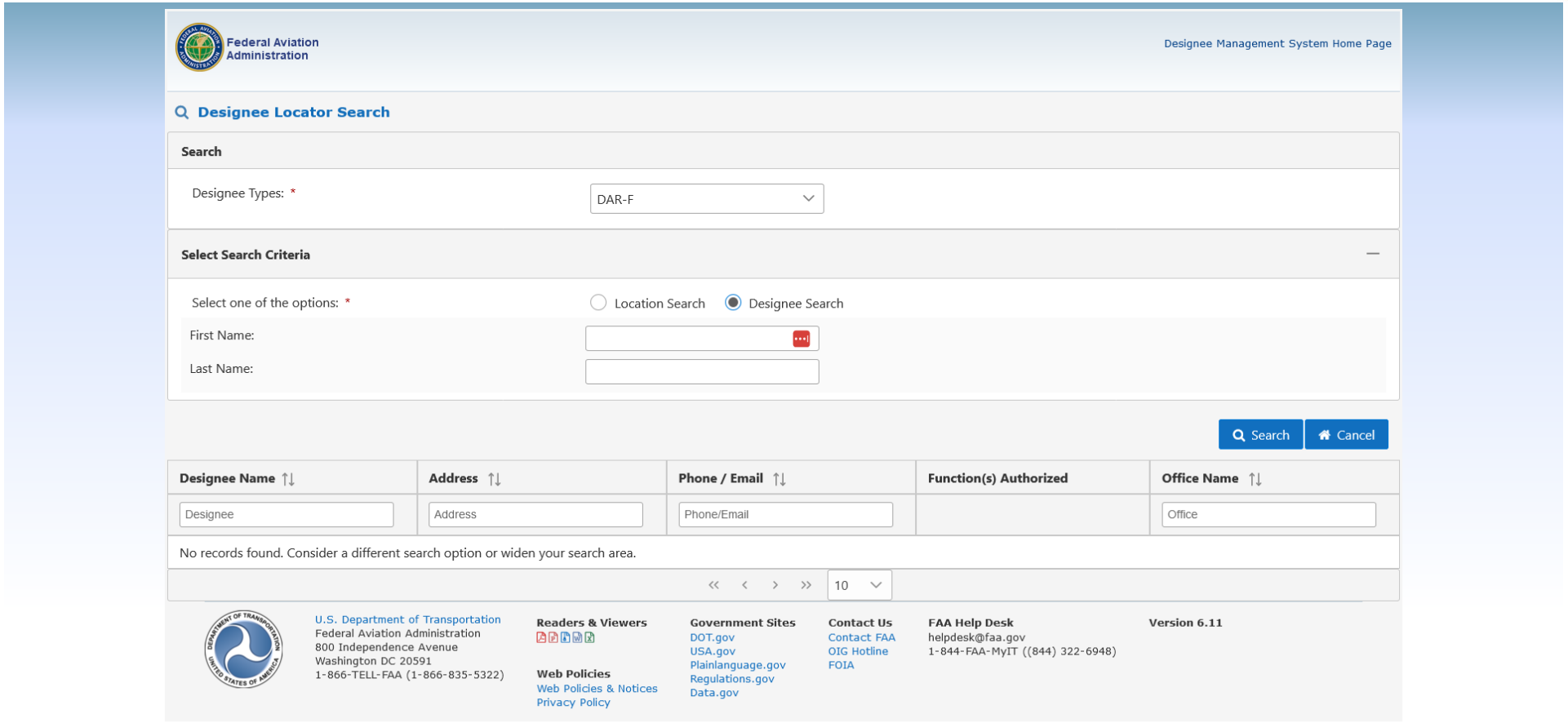
FAA Form 8130–3 (02–14) NSN: 0052-00-012-9005

- If it is signed by an individual designee, then you can check the name against the FAA's current designee lists:
- https://designee.faa.gov/designeeLocator
- NOTE: this may fail to identify a past signature if that person is no longer a designee
- NOTE: this will not identify ODA signatories

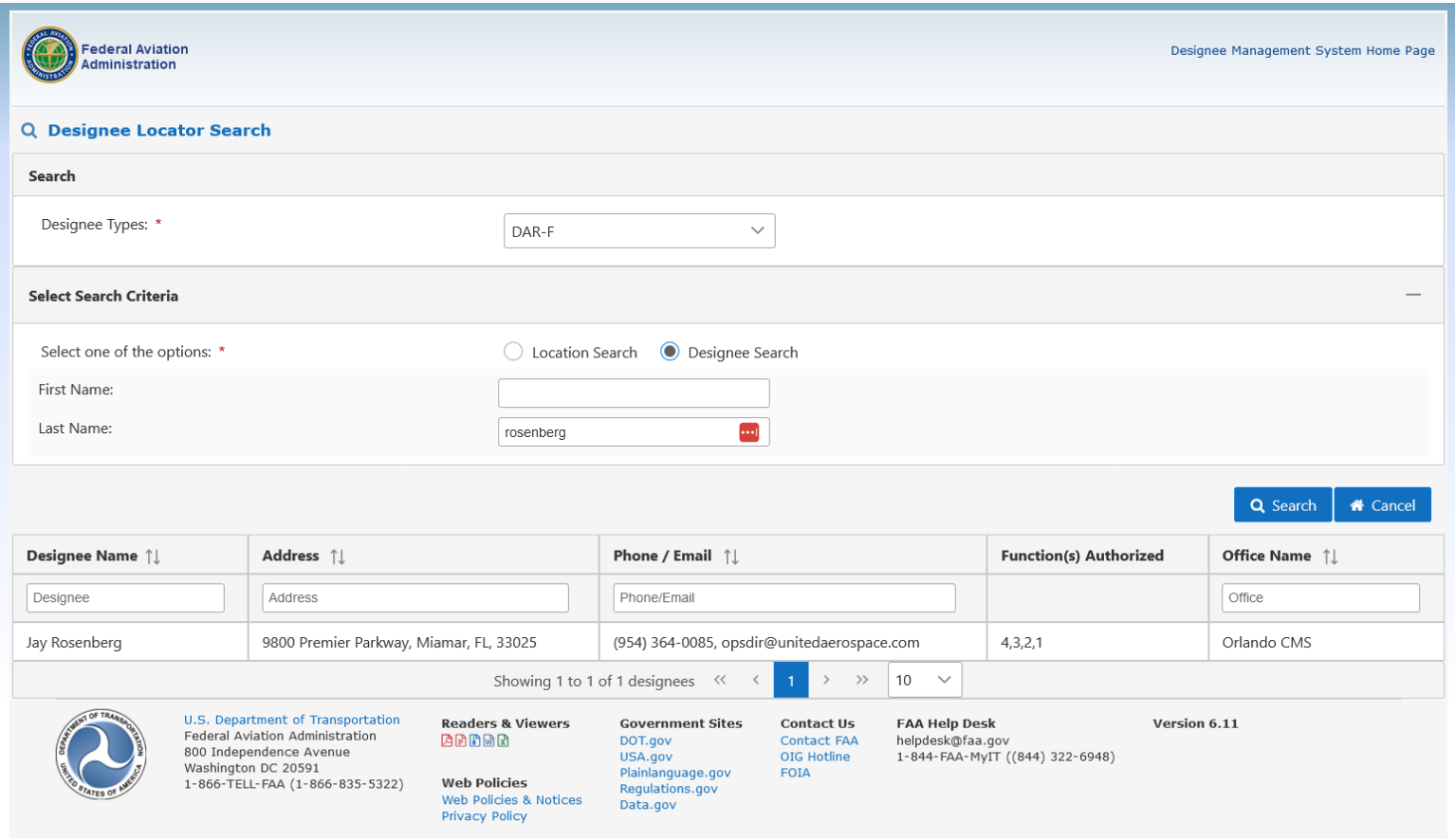
https://designee.faa.gov/designeeLocator



Look at Block 13c to Identify the Designee Type (DAR-F, DAR-T, DMIR)



Choose “Designee Search” and Type in the Name of the Designee



Checking on Designees is not a Perfect System

- The FAA used to publish DAR directories, which allowed you to cross reference the signature date against relevant directory, but these are no longer available
- Retired designees are no longer shown, so if you have an older tag then you may not be able to find a DAR who was authorized at the time
- There is no public database of ODA authorized representatives
- There is no public database of PAH authorized representatives

Remember: This Same Form is Used for Maintenance and Alteration

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: ☐ Approved design data and are in a condition for safe operation. ☐ Non-approved design data specified in Block 12.		14a. ☐ 14 CFR 43.9 Return to Service ☐ 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

It is important to understand that the existence of this document alone does not automatically constitute authority to install the aircraft engine/propeller/article.

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.

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.

FAA Form 8130–3 (02–14) NSN: 0052-00-012-9005

- Correlate the form to your repair order or purchase order
- Make sure the authority in block 1 and block 12 is acceptable
- Make sure blocks 7-11 match the part that you receive
- Make sure blocks 11-12 describe the work as you expect it
- Make sure the signature block reflects your expectations

Parts Accepted under a Bilateral Agreement are Called “Approved”

- Bilateral Airworthiness Safety Agreements (BASA)
- US treats as “approved” all parts produced under non-US approval, but accepted under a BASA (14 C.F.R. § 1.1)
  - The documentation is a record that demonstrates the finding of airworthiness
- EU accepts the documentation associated with parts acceptable under a BASA, as equivalent documentation, and that acceptance is consistent with EASA 145.A.42 <u>receipt requirements</u>

What About Europe?

- FAA: *Approved* means:
  - Approved by the FAA or
  - Approved by 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
- EASA: Requires that installers may only receive new parts that meet documentation requirements
  - Aside from certain exceptions (see EASA 145.A.42), these documents can only be obtained for government-approved parts, so they are an indicator of government approval
  - European Union signs bilateral agreements to accept foreign certificates, like the 8130-3

EASA is Serious About Documentation

- EASA 145.A.42 categorizes parts
- Parts without documentation are treated as "unsalvageable"

"The following types of components should typically be classified as unsalvageable:

* * *

(g) components for which maintenance records and/or traceability to the manufacturer cannot be retrieved."

EASA AMC1 145.A.42(a)(iii)

"Unsalvageable components shall not be permitted to re-enter the component supply system..."

EASA 145.A.42 Components (c)(ii)

Required Documentation *(from a regulatory standpoint)*

Regulation (EU) No 69/2014

1. Approving Competent Authority / Country		**2. AUTHORISED RELEASE CERTIFICATE** **EASA FORM 1**			3. Form Tracking Number
4. Organisation Name and Address:					5. Work Order/Contract/Invoice
6. Item	7. Description	8. Part No.	9. Qty.	10. Serial No.	11. Status/Work
12. Remarks					

13a. Certifies that the items identified above were manufactured in conformity to: □ approved design data and are in a condition for safe operation □ non-approved design data specified in block 12		14a □ Part-145.A.50 Release to Service □ 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 Part-145 and in respect to that work the items are considered ready for release to service.	
13b. Authorised Signature	13c. Approval/Authorisation Number	14b. Authorised Signature	14c. Certificate/Approval Ref. No.
13d. Name	13e. Date (dd mmm yyyy)	14d. Name	14e. Date (dd mmm yyyy)

USER/INSTALLER RESPONSIBILITIES
This certificate does not automatically constitute authority to install the item(s).
Where the user/installer performs work in accordance with regulations of an airworthiness authority different than the airworthiness authority specified in block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts items from the airworthiness authority specified in block 1.
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.

EASA Form 1-21 Issue 2.

- Production Organization Approval holders <u>must</u> issue EASA Form 1 for their new, airworthy aircraft parts
  - EASA 21.A.163(c), 21.A.165(c)
- This is required under EU law
- The tag is also a US *import* condition if you want the FAA to treat it as an airworthy part
  - 14 C.F.R. § 21.502(c)

Other Types of Non-Approved Parts

- Several types of parts do not need to be produced under an FAA production approval, including:
  - Standard parts
  - Owner-operator produced parts
  - Maintenance produced parts

Standard Parts

- Manufactured to
  - U.S. Government Standard (e.g. mil spec), or
  - Industry Standard
    - Industry standard-setting body
    - Published / available to the public
    - Proprietary standards generally excluded
- Different from EASA definition
  - EASA accepts <u>manufacturer's standards</u> published in the type design
    - E.g. Airbus proprietary standards are acceptable under the EASA system
    - But Airbus proprietary standards must have an EASA Form 1 in the US system

Standard Parts and Certificate of Conformance

- Standard parts are typically reflected on a certificate of conformance or C of C
- The C of C traditionally verifies that the part *meets the standard* to which it was produced
  - Check the standard!!!
  - It could be a customer-specified standard, in which case it may not be a “standard” under FAA definitions
- The original C of C is typically issued by the manufacturer, but in some cases may be issued by a distributor that confirmed technical compliance

Washington Aviation Group

CERTIFICATE OF CONFORMITY

Based upon testing and confirmation, we, the undersigned manufacturer

Company	Washington Aviation Group
Street	2233 Wisconsin Avenue, NW
City/State/Zip	Washington, DC 20007
Telephone	+1 (202) 628-6777
Email	info@washingtonaviation.com

Certify and declare that the following product:

One hundred cadmium-plated bolts (p/n WAS56-1002)

Has been assessed and tested and found to conform to each of the following standards:

ASTM A193
ASTM B766
Mil-Spec QQ-P-416F

George Washington, President
Washington Aviation Group, PC
Date: December 14. 1799

FAA Interpretation of Owner-Produced Parts

- Owner-operator of the aircraft on which the parts will be installed must be involved in at least one of the following:
  - Design of the parts (e.g. designs come from the air carrier's engineering department), or
  - Quality of the parts (e.g. someone else designs the part but the air carrier designs and controls the in-process and final tests and inspections)

- ***These parts are typically NOT offered for separate sale for installation in a type certificated product***

FAA Maintenance-Produced Parts

- Parts produced to be consumed during a maintenance or alteration activity
  - ***These parts are typically NOT offered for separate sale for installation in a type certificated product***
- FAA AC 43-18 recommends practices:
  - Have a fabrication inspection system to ensure quality
  - Mark parts to indicate their source
  - Issue maintenance instructions if the maintenance system changes
- FAA 14 C.F.R. 21.9(a) requires the fabricator to produce the parts under a quality system
  - Codifying the AC 43-18 recommendation

How is Parts Installation Regulated by the FAA?

Maintenance means inspection, overhaul, repair, preservation, and the replacement of parts, but excludes preventative maintenance

14 C.F.R. § 1.1

Parts Installation

Installation of a part is a type of
Maintenance, which must be subject to the
FAA rules that apply to maintenance (e.g. Part 43)

Airworthiness Documentation in the US: Relevant During Maintenance

- During maintenance activities, the installer has an obligation to ensure that the work is performed in such a manner and using materials of such a quality …
  - that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at <u>least equal</u> to its <u>original or properly altered</u> condition …
    - with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness.

14 C.F.R. § 43.13(b)

At Least Equal

- Installation of any replacement or modification part must achieve the same level of safety as the approved design
- The installer needs to have objective evidence that the part will return the product to an airworthy condition

Evidence of Airworthiness

- Test & computation (***traceability*** **and documentation are NOT legal requirements in the U.S.)**
  - There is no U.S. corollary to EASA 145.A.42, so documentation is not a requirement
  - But alternatives to documentation can be resource-intensive
- **Traceability** to a manufacturer: production certificate holder's quality system assures airworthiness
  - EASA form 1 or 8130-3 tag for new parts confirms the part was released from a production approval system
  - The approved PAH system proves that the part was airworthy upon release
- **Traceability** to a maintenance facility: certain maintenance (e.g. an overhaul) assures airworthiness

Airworthiness Documentation is Evidence

- The real value of traceability is that it supports the installer's obligation to ensure airworthiness at the time of installation
- If a document request does not support this airworthiness analysis, then you may consider inquiring about the purpose of the request
- Commercial documentation requests are common in the industry, but Bertrand Russell might ask whether they are sometimes absurd

Thank You!

Jason Dickstein
Aviation Suppliers Association General Counsel
Washington Aviation Group
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Jason@WashingtonAviation.com