Quality Committee Meeting

Sunday, June 14th, 2026

ASA Quality Assurance Committee Antitrust Compliance Statement

- From time to time, the ASA Quality Assurance Committee is asked to discuss matters that could affect competition. 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. This includes geographical limitations (e.g. you sell West of the Mississippi and I will sell to the East) and well as other allocation strategies (you sell exclusively to air carrier X and I will sell to air carrier Y);
  - Agreements to limit production or availability of parts
- 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 that could impact competition 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. 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

Thank You to our Sponsor

Meeting Agenda (*Subject to Change*)

9:00 am	Welcome; Antitrust Statement	Knights, J Dickstein
9:10 am	ASA-100 and ASACB Program Update	O'Connor
9:20 am	Concerns Identified During Audits	O'Connor, Kinney
9:35 am	FAA Maintenance Division Update	Jackie Black (FAA)
10:35 am	BREAK	
11:00 am	FAA Aircraft Certification Service Update	Fred Gentile (FAA)
11:30 am	An introduction to aircraft parts certification rules and how they affect the term "approved parts."	J Dickstein
12:00 pm	LUNCH	
1:00 pm	The differences between "standards parts" definition in the US and EU; global marketability of those parts; documentation recommendation	J Dickstein
1:10 pm	Documentation Fraud – How to Recognize it; How to Respond	Matos, Knights

1:30 pm	Government Affairs: ASA Projects	J Dickstein
2:00 pm	ASA-100 Proposals: Facility/Inventory Security Requirements and formation of a subcommittee to discuss and develop solutions: • Adding security requirements • Clarifying ASA-100 ¶ 3(b)	Knights, Committee
2:20 pm	ASA-100 Proposal: Clarifying the Requirement for Caps and Plugs and formation of a subcommittee to discuss and develop solutions	Knights, Committee
2:30 pm	Safety Management Systems: Discussion of ideas about how ASA could add value in anticipation of customer inquiries about distribution SMS	J Dickstein, Committee
2:45 pm	Update on the LLP Group	Chaput
2:55 pm	ASA Statement 2020: formation of a subcommittee to discuss and develop changes	Knights, Damron
3:10 pm	New Business and Open Discussion	Committee
3:30 pm	ADJOURN	

ASA-100 and ASACB Program Update

Sam O’Connor

ASA-100 Program Update

ASA-100 Audit Statistics

	2022	2023	2024	2025	2026 thru May
Audits by Unique Tracking ID	460	520	848	851	434
Audits with Findings	257	329	552	679	275
Number of NCRs Written	959	913	2841	2589	978
% Audits with Findings	56%	63%	65%	80%	63%
Avg NCRs/ All Audits	2.1	1.8	3.4	3.0	2.25
Avg NCRs/Non Initial Audits			2.4	2.6	2.0
Number of Initial Accreditation Audits			194	136	54
# NCRS in Initial Audits			1261	715	262
NCRs per Initial Accreditation Audit			6.5	5.3	4.9

ASA-100 Audit Trends – Key Takeaways for Auditors (2022–2026 YTD)

Sustained high audit volume

- ❑ Audits increased from **460 (2022)** to **~850 (2024–2025)**; **434 audits by May 25, 2026** with forecast currently at 1100 for the full year indicates another high-volume year.
- ❑ Plan staffing, scheduling, and calibration assuming this **higher workload is the new baseline. (~30% increase over 2025)**

More thorough audits, then partial normalization

- ❑ % with findings: **56% (2022)** → **63–65% (2023–2024)** → **80% (2025)** → **63% (2026 YTD)**.
- ❑ Avg NCRs/audit: **~2 (2022–2023)** → **3.4 (2024)** → **3.0 (2025)** → **2.25 (2026 YTD)**.
- ❑ ASA needs to ensure **consistent application of criteria** so intensity stays appropriate, not variable by year or auditor.

Initial accreditations: still NCR-dense but improving

- ❑ NCRs per initial audit: **6.5 (2024)** → **5.3 (2025)** → **4.9 (2026 YTD)**.
- ❑ Applicants appear to be better prepared as evidenced in a downward trend in NCRs/audit; use this to **focus on systemic issues** and reinforce effective **pre-audit guidance**.

2025/2026 ASA-100 NCR Overview

- **NCRs Generated**
  - ❑ **2025 = 2589 NCRs**
  - ❑ **2026 (YTD May 25, 2026) = 958 NCRs**
- **Top 5 clauses = ~67% of all findings in 2025 and ~63% in 2026** :
  - Procurement & Supplier Control (2025= 17%, 2026 = 16%)
  - Training & Authorized Personnel (2025 = 16%, 2026 = 16%)
  - Quality Manual (2025 = 13%, 2026 = 11%)
  - Material Control & Segregation (2025 = 11%, 2026 = 8%)
  - Self-Audit (2025 = 10%, 2026 = 10%)
  - Receiving Inspection (2025 = 6%, 2026 = 8%
- **Key risk areas:**
  - Supplier / operational controls
  - Personnel competency and authorization
  - Internal oversight

ASACB Programs Update

Update on Release of ISO 9001 and IA9100/IA9110/IA9120

1. ISO 9001 release date is now set for Q3 2026
    - Global Accreditation Cooperation Incorporated (Global ACI) has drafted documents that define the transition requirements, and these documents are expected to published mid-summer 2026.
2. IAQG has decided to incorporate the ISO 9001 updates into the new IA revisions
3. Originally the release timeframe of the IA9100/IA9110/IA9120 was Q1 2027, IAQG has stated as of the March 2026 Winter meeting they will most likely pull in their standards release date to Q4 2026.
4. This will impact the 10 months preparation timeline for a potential deployment from January to October 2027. During this timeframe
    - ABs to transition with auditors trained
    - Training providers to create training courses, get approval and training be available
    - Authenticated auditors to be trained and transitioned in OASIS
    - CBs to transition
5. Once the 10-month deployment timeframe has ended then the following will occur.
    - Existing certified organizations transition over a 14-20 months timeframe
    - All new initial certifications must be to the new revision

ISO 27001 Update

1. Transitioned to the new ISO 27006-1-2024.
    - Must use this new standard for all client audits from March 31, 2026
    - Block Aero located in Bangkok, Thailand becomes second ISO 27001 certified organization
2. ISO 14001 accreditation status
    - Application for accreditation expansion accepted and approved by ANAB Feb 2026
    - PeopleTec, LLC located in Huntsville, AL agrees to be witness for stage 1 and stage 2
    - Stage 1 audit confirmed for June 19, 2026
    - Stage 2 pending confirmation from ANAB to occur between August 31 and Sept 2
3. ANAB heads up 553 defines transition plan for ISO 14001:2015 to ISO 14001:2026
    - Deadline transition is April 30, 2027, and,
    - Completion of all transition activity by April 30, 2029
    - A declaration of transition and submittal of supporting documentation will include:
        - Transition plan
        - Documentation revised to support transition and/or revised requirements
        - Necessary competence, to the revised document, has been determined by the (CAB) / certification body (CB) and they have sufficient number of resources (e.g. auditors, technical experts, decision maker, etc.)
        - CAB has a process to determine audit duration that supports the revised certification program
        - CAB has a process to manage control of certifications to the revised document that includes (a) issuing accredited certificates only after the AB transition decision and (b) managing appropriate expiration dates for previously issued certificates.

Concerns Identified During Audits

Sam O’Connor and Lea Kinney

ASA-100 Concerns Identified During Audits

Top Problem Areas & Typical Findings

- **Clause 5: Procurement & Supplier Control (2025 =17%, 2026 = 16%)**
  - ❑ Weak supplier evaluation/approval
  - ❑ POs missing quality / traceability requirements
  - ❑ Incomplete flow-down of ASA-100 and regulatory clauses
- **Clause 4: Training & Authorized Personnel (2025 = 16%, 2026 = 17%)**
  - ❑ Missing / outdated training and authorization records
  - ❑ Tasks performed by non-authorized personnel
  - ❑ Poor tracking of recurrent training and qualifications
- **Clause 1: Quality Manual (2025 = 13%, 2026 = 11%)**
  - ❑ Procedures not reflecting current practice
  - ❑ Incomplete coverage of ASA-100 requirements
  - ❑ Weak document control (revisions, distribution, access)
- **Clause 8: Material Control & Self-Audit (2025 = 11% & 10%, 2026 = 8% & 10%)**
  - ❑ Inadequate segregation and labeling of serviceable vs unserviceable/suspect parts
  - ❑ Weak control of nonconforming material
  - ❑ Audits not completed per schedule or not covering all clauses
  - ❑ Weak follow-up and closure of internal findings

Cross-Cutting Root Cause Themes

Across multiple clauses, four themes recur:

1. **Process Ownership & Integration**
   - ❑Quality requirements not fully built into Procurement, Receiving, Shipping, Warehouse processes.
2. **Training & Competency Management**
   - ❑Inadequate definition, delivery, and tracking of role-based competencies.
3. **Internal Oversight & Follow-Through**
   - ❑Self-audits and corrective actions not consistently effective at preventing recurrence.
4. **Documentation vs Practice Misalignment**
   - ❑Procedures and Quality Manual lag behind actual practice or are not followed.

Priorities & Management Takeaways

- **Clause 5: Procurement & Supplier Control**
  - ❑Standardize supplier qualification, monitoring, and PO quality clauses.
- **Clause 4: Training & Competency**
  - ❑Centralize training/authorization records and define competencies by role.
- **Clause 2: Internal Oversight (Self-Audit & CA)**
  - ❑Risk-based audit program, trained internal auditors, and verified CA effectiveness.

Key Takeaways

- Majority of NCRs stem from a few high-impact clauses.
- Several areas (Quality Manual, Shelf-Life, Corrective Action, Records, Certification & Release) show that targeted action works.
- Focusing on systemic themes (process integration, training, oversight, documentation alignment) offers the greatest reduction in future ASA-100 findings.

FAA Maintenance Division Update

Jackie Black

FAA Aircraft Maintenance Division Update

Presented to: ASA / AFRA Conference Attendees

By: Jackie Black, FAA Aircraft Maintenance Division Manager

Date: June 14, 2026

Overview

- **Safety Management Systems (SMS)**
- **Advisory Circular (AC) 00-56 Voluntary Industry Distributor Accreditation Program Revision**
- **FAA Suspected Unapproved Parts (SUPs) Program**

Safety Management Systems (SMS)

- **Formal, top-down, organization-wide approach to managing safety risk and assuring effectiveness of safety risk controls**
- **§ 21 Manufacturers**
- **§ 121 Air Carriers**
- **§ 135 Air Carriers**
- **§ 91.147 Letter of Authorization Holders**
- **§ 145 Repair Stations**

Safety Management Systems (SMS)

- **Information regarding Safety Management Systems (SMS) can be found in Advisory Circular (AC) 120-92D Safety Management Systems for Aviation Service Providers in the FAA Dynamic Regulatory System (DRS) https://drs.faa.gov/browse.**

Advisory Circular AC 00-56 Revision

- AC 00-56 revision is continuing with the revision process to incorporate additional recommendations and enhancements
- SMS attribute Risk Assessment incorporation
- Remote auditing

Advisory Circular AC 00-56 Revision

- **Permanent approach to recurrent remote auditing in situations where it makes sense and low risk**

- **FAA Order 8900.1, Vol 1, Ch 3, Sec 9 Remote Technology Risk Based Decision Making Job Aid**

- **www.drs.faa.gov**

Bilateral Agreements and Mutual Acceptance of Maintenance and Parts

- **Return to Service Documents**
  - **FAA: FAA Form 8130-3**
  - **EASA: EASA Form 1**
  - **TCCA: Canada Form One**
  - **CAAS: CAAS(AW)95**
  - **FOCA: EASA Form 1**
  - **UK CAA: CAA Form 1**

- **Note: Only dual releases are recognized**

  <u>NO</u> triple or quadruple releases

Bilateral Agreements and Mutual Acceptance of Maintenance and Parts

- **FAA web address for Aviation Safety - International Agreements and related documents https://www.faa.gov/aircraft/air_cert/international/bilateral_agreements/baa_basa_listing**

FAA Order 8120.16 Processing Reports of Suspected Unapproved Parts

- **Establishes procedures for FAA personnel involved in SUPs investigations**
- **Provides definitions of SUPs terms**
- **Differentiates between SUPs and improperly maintained or altered parts**
- **Recognizes that improper maintenance may make a part ineligible for installation, but may not make it an unapproved part**
- **Is presently in the process of being revised**

SUPs Policy and Guidance

- **FAA Order 8120.16 - Describes the policies and procedures for the FAA SUPs Program**
  (i.e., what the FAA will do when processing a SUPs report)
- **AC 21-29 - Provides guidance to the public for detecting SUPs *(i.e., what to do when identifying a SUP)***
- **AC 20-62 - Provides information and guidance for use in determining the quality, eligibility, and traceability of aeronautical replacement parts *(i.e., a method for industry to determine parts are conforming)***
- **https://www.faa.gov/aircraft/safety/programs/sups**

SUPs Definitions

FAA Order 8120.16 defines:

- Approved Part
- Unapproved Part
- SUP

► **"Acceptable part" is defined by FAA Advisory Circular 20-62E**

Trends in SUP’s

- **Impersonation of legitimate companies' website and social media.**
  - Copying photographs and logos
  - Company histories
  - Advertising Spare Parts
- **DAR-T’s performing improper conformities of parts**
  - Without possessing technical data
  - Not at the parts location

Potential Indicators of Unapproved Parts

- No documentation or incomplete documentation
- Misrepresented sourcing
- New parts that are not in conformance
- Questionable packaging
- Counterfeit qualities
- Questionable markings
- Failure rate
- Appearance
- Price

Stolen Scrapped Turbine Engine Parts Prior to Mutilation

- A shipment of 12 container consisting of 10365 non-airworthy aircraft engine parts slated to be scrapped, were rerouted (stolen) late January 2026.
- Three containers held 625 serialized parts including engine critical or Life-Limited Parts.
- Engines affected CFM56, IAE V2500, PW1100 and RB211 turbofan engines.
- Europe's Law Enforcement is investigating
- There is concern that these parts may be offered for sale on the open market.

Stolen Scrapped Turbine Engine Parts Prior to Mutilation

- EASA has issued a Suspected Unapproved Parts notification OC-EASA-2026002221 which contains 2 lists, one of serialized and life-limited parts and another of non-serialized parts.
- FAA has issued a Special Airworthiness Information Bulletin: SAIB-2026-00445-E. For further information contact Stephen Elwin, Senior Engineer, AIR-525, 1200 District Avenue, Burlington, MA 01803; phone: (781) 238-7236; e-mail: Stephen.L.Elwin@faa.gov.

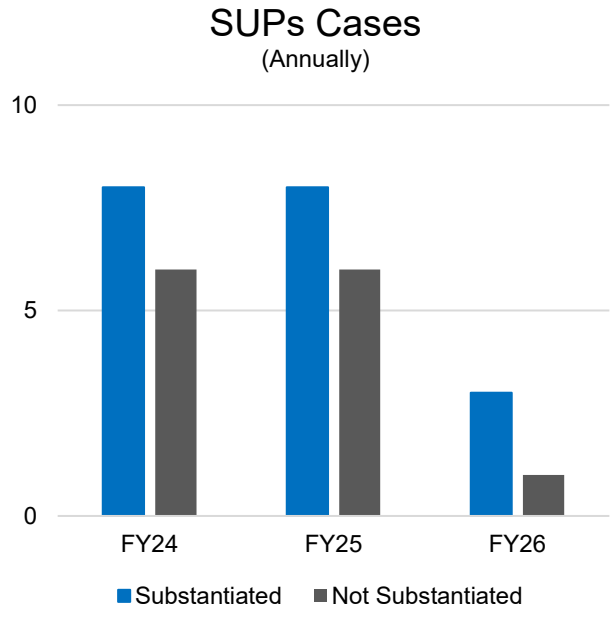
What to do when you discover a SUP

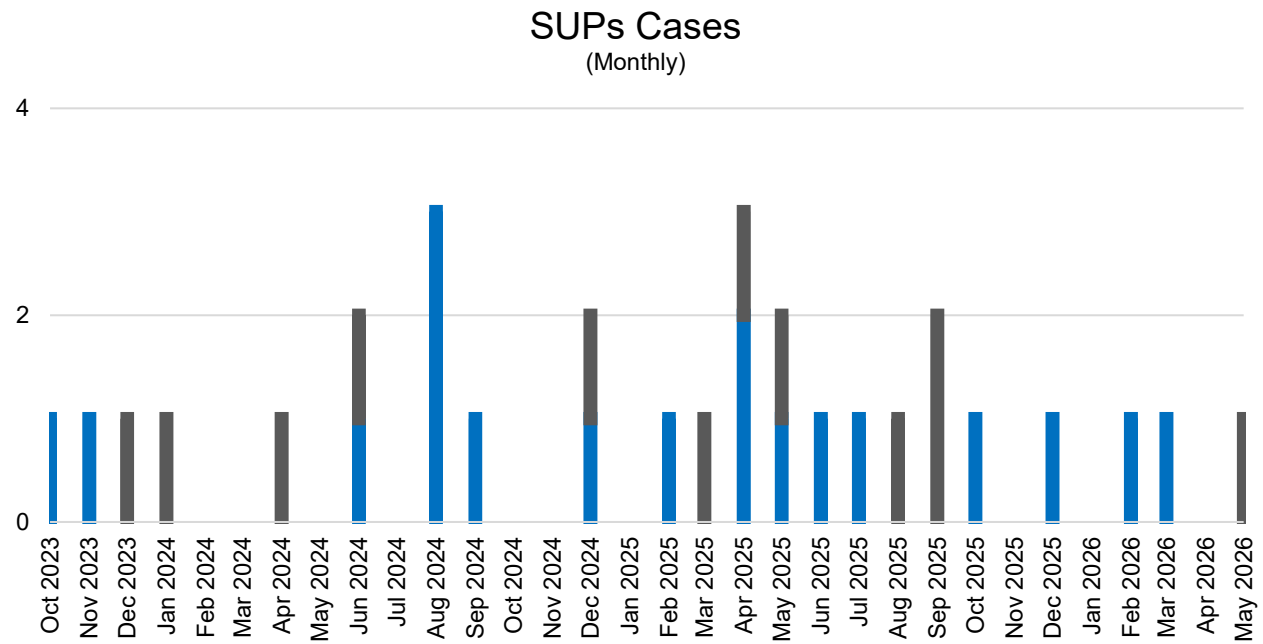
- **Please complete an FAA Form 8120-11, Suspected Unapproved Parts (SUPs) Report**
- **Additionally, the FAA Form 8120-11 and all supporting documentation must be submitted to the FAA Hotline Reporting System**
- **Additional helpful information can be found at the FAA Suspected Unapproved Parts (SUP) Program website**

Suspected Unapproved Parts Statistics

31
Cases Initiated
FY24 – FY26

19
Cases Substantiated
FY24 - FY26





Advisory Circular AC 00-56 Accreditations

Questions

FAA Aircraft Certification Service Update

David Jeffrey, FAA, Airworthiness and Production Section, AIR-632

ASA Quality Committee - Property of ASA

FAA Presentation for ASA/AFRA

June 14, 2026

Federal Aviation Administration

FAA Perspectives on Quality Systems, Documentation, and SUP Prevention

David Jeffrey, Airworthiness and Production Section, AIR-632

• ASA/AFRA Annual Conference • ASA Quality Committee

FAA's Purpose Today

FAA Outreach Goals:

- Strengthen collaboration with distributors
- Share FAA field observations
- Reinforce requirement for objective evidence of manufacture under Part 21, 21.331(a)
- Support SUP prevention efforts
- Encourage field feedback

Definitions

§ 3.5 Statements about products, parts, appliances and materials

- ***Airworthy*** means the aircraft conforms to its type design and is in a condition for safe operation

Definitions, (cont)

Order 8120.23A, C2, Certificate Management of Production Approval Holder

- ***Manufacturer.*** A person as defined by 14 CFR part 1, Definitions and Abbreviations, who causes a product, article, or part(s) to be produced. A manufacturer may be a PAH or a supplier to a PAH

Quality Systems: Why They Matter

- Foundation for system integrity
- Reduce risk of unapproved parts
- Improve accountability and audit readiness
- Support consistent and compliant operations

Quality System Focus Areas

- Receiving: documentation checks, visual inspection, segregation
- Purchasing: approved sources and supplier monitoring
- Training: documentation accuracy, counterfeit recognition, regulatory awareness

FAA Resources

Orders:

- 8130.21, *Completion of FAA Form 8130-3 under Part 21*
- 8120.16, *Suspected Unapproved Parts*
- 8120.18, *Production Approval Holders (PAH) Who Rebuild or Alter Their Own Products or Articles Under 14 CFR 43.3(j)*
- 8120.22, *Production Approval Procedures*

FAA Resources

Advisory Circulars:

- 00-56, *Voluntary Industry Distributor Accreditation Program*
- 20-62, *Eligibility, Quality, and Identification of Aeronautical Replacement Parts*
- 21-29, *Detecting and Reporting Suspected Unapproved Parts*
- 21-43, *Production Under 14 CFR Part 21, Subparts F, G, K, and O*
- 21-44, *Issuance of Export Airworthiness Approvals Under 14 CFR Part 21 Subpart L*

Additional Resources

FAA Order 8130 21J Reorganization FAA Form 8130 3 Guidance and Policies on the FAA YouTube Channel

- https://www.youtube.com/watch?v=sS1GkFWZX44&list=PL5vHkqHi51DS_SQCFPqbcpKIpymRZmYLf&index=1

- Industry standards: ASA-100, AS9120, AS9100

New versus Used

- When Does a Product or Article Go from “New” to “Used”
- A product or article is new if it remains under the production approval holder’s (PAH) Part 21 quality system, the aircraft has not been flown for purposes other than flight test, and ownership has not transferred

New versus Used

- What Effect Do Hours or Cycle Times Have on Determining if Products or Articles Are New Under Part 21
- From a production viewpoint, hours or cycle times have very little effect on determining if a product or article is new. Those hours and cycle times are used to determine when a maintenance action is required. Products and articles can still be considered new even with hours or cycle times on them

Form 8130-3: Eligibility

- When required vs. optional
- Certificate of Conformance
- When not permitted
- Domestic vs. international acceptance

Form 8130-3: Proper Completion

- Block-by-block expectations
- Common errors
- Importance of accuracy
- Avoiding pre-signed or generic tags

Issues From the Field

- Documentation discrepancies
- Misrepresented “standard parts”
- Counterfeit/tampered parts
- Documentation gaps
- Improper storage/handling

SUP Program: Current Focus

SUP Improvements:

- Data-driven risk identification
- Outreach to distributors
- Strengthened reporting pathways
- Early detection emphasis

Questions

Approved Parts

An introduction to FAA aircraft parts certification rules and how they affect the term “approved parts.”

General Rule of Aircraft Parts Manufacturing

- Generally, parts manufacturers need government approval to produce parts in most jurisdictions
- As with all general rules, there are (many) exceptions
- We will investigate the scope, limits and exceptions of this general rule

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?

- 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 design and production 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, the person may not produce that article unless it is—
  - (1) Produced under a type certificate;
  - (2) Produced under an FAA production approval;
  - (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.

PC, PMA or TSOA

Approved Parts: Representations

- 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

Categories of “Approved” Parts

- Parts Manufacturer Approval (PMA)*
  - Used to approve for replacement and modification aircraft parts
  - A hybrid approval in that both design and production are approved in a single document
  - Generally cannot be transferred, because production approval cannot be transferred

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

Categories of “Approved” Parts

- 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
  - US, EU and Canada have changed from a TSOA validation model to a mutual acceptance model!

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

Categories of “Approved” Parts

- Type Certificate (TC) Only Parts
  - When a TC has been issued but no production approval exists
    - The United States permits TC holders to ship parts under the existing quality system
  - When the production approval is issued, the holder must analyze all changes to the production quality system
    - The holder must identify each part that could have been affected by a change to the production quality system between (1) the time of production and (2) the time the production quality system was approved in the production approval
    - All affected parts must be recalled for remedy

* = TC-only parts may **not** be acceptable in other countries

Categories of “Approved” Parts

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

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

Categories of “Approved” Parts
In any other manner …

- 14 C.F.R. § 21.8 If an article is required to be approved [under the FAA’s regulations], it may be approved—
  - (a) Under a PMA; *
  - (b) Under a TSO; *
  - (c) In conjunction with type certification procedures for a product; or
  - *(d) In any other manner approved by the FAA.*

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

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 manufacturer's standards published in the type design
  - This will become important in the *next* presentation

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)

FAA Maintenance-Produced Parts

- Parts produced to be consumed during a maintenance or alteration activity
- 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 required the fabricator to produce the parts under a quality system
  - Codifying the AC 43-18 recommendation

Commercial Parts

- Historically, this term was used to describe parts that were excluded from FAA oversight because they were not specifically manufactured with the intent they be installed in aircraft (before the 2011 rule change)
  - E.g. certain light bulbs, proprietary fasteners, proprietary seals, coatings, bearings, etc.

Definition: Commercial Part

- *Commercial part* means an article that is listed on an FAA-approved Commercial Parts List included in a design approval holder's Instructions for Continued Airworthiness required by § 21.50

14 C.F.R § 21.1(b)(3) (*became effective 2011*)

Commercial Parts

- Since 2011, Design Approval Holders have had the privilege of naming commercial parts
  - The list would be approved by the FAA
  - The list would become part of the ICAs
- Parts that are not listed in the ICAs by manufacturer and nomenclature are not “commercial parts”

Production Approval Holders and 8130-3 Tags

- FAA production approval holders (PAHs) may establish a control mechanism to issue 8130-3 tags (14 C.F.R. § 21.137(o))
  - Voluntary, but strongly encouraged
  - Installers may rely on this, but it is not the only way for an installer to determine airworthiness
- Precedent for this was set under the European (EASA) rules, which require PAHs to issue EASA Form 1
  - Installers are required to obtain the EASA Form 1, creating a closed-loop system in Europe

How is Parts Installation Regulated as Maintenance 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

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 least equal to its original or properly altered 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
- Traceability to a manufacturer: production certificate holder's quality system assures original airworthiness
- Traceability to a maintenance facility: certain maintenance (e.g. an overhaul) confirms (then-)current airworthiness

Summary of the FAA Rules

- The manufacturer must have FAA approval to manufacture the articles
  - There are exceptions
- The installer needs to know that the articles are airworthy
  - An 8130-3 tag is a useful tool that helps make this finding
- Traceability can help bridge this gap
  - By providing evidence of airworthiness

Standard Parts

The differences between “standards parts” definition in the US and EU; global marketability of those parts; documentation recommendation

Standard Parts

- US Rules
  - Parts must conform to established industry or U.S. specification, e.g.:
    - National Aerospace Standard (NAS)
    - Air Force/Navy Aeronautical Standard (AN)
    - Society of Automotive Engineers (SAE or AS)
    - Military Standard (MS)
  - Standard must include design, manufacturing, and uniform identification requirements
  - Standard must be published so that anyone can manufacture the part

- EU Rules
  - US definition of standard parts
  - ***Also, an EU type certificate holder can identify standard parts - this would be a proprietary standard***
- The installer must get a C of C from the part manufacturer declaring
  - name of the part
  - part number
  - conformity to its design data
  - the date of issuance
- *The C of C can come in the form of a dated delivery note*

Clarifying Language on Standard Parts

- **US-EU Bilateral TIP**
- *7.10.3 The importing Authority will accept standard parts exported from the other party when accompanied by a manufacturer's Certificate of Conformity verifying the part's compliance to an officially recognized standard, e.g. a U.S. or EU industry, U.S. or European government or international specification.*

EU Proprietary Standard Parts

- EU TC holder-identified standard parts are acceptable for installation on EU-registered aircraft, as well as the aircraft of other nations who follow the EU approach

- EU TC holder-identified standard parts are unapproved parts if sent directly to the United States for installation in an N-registered aircraft
  - The US does not recognize them as standard parts
  - They have not been produced under a recognized production approval
  - They lack an EASA Form 1

EU Proprietary Standard Parts – How Do We Make them Approved Parts?

- When an EU TC holder-identified standard part is processed through a POA system, it becomes a POA part
- Such parts are required to be released with an EASA Form 1
- The bilateral agreement anticipates that they will be released with an EAAS Form 1
- These are approved parts
- Example: parts that are based on an Airbus proprietary standard can be processed through the Airbus POA and they become approved part under the Airbus POA
- Such parts will bear an EASA Form 1 issued from the POA system

EU Proprietary Standard Parts – Other Strategies for Approval

- FAA issues TSOAs for things that might otherwise appear to be standard parts
  - Fastener TSO [C-148]
  - Bearing TSO [C-149]
  - Seals TSO [C-150a]
- FAA also can issue a PMAs for such parts
- A non-US fabricator can be a supplier to a U.S. production approval holder (like a PMA holder)

Read the Documentation Carefully

- If you are receiving an alleged standard part with a C of C, then check:
  - Does the C of C certify conformance to a standard?
  - Does the C of C identify the standard?
  - Does the identified standard qualify as a standard?
  - Are the parts marked consistent with the standard?

- If receiving a part made to a proprietary standard from the EU then it should arrive with an EASA Form 1

- C of C red flags may include:
  - Failure to identify the standard
  - “produced to the purchase order”
  - Lack of markings when the parts are typically marked

Airbus Standard Codes

- ABS
- ASN
- ASNA
- ASNB
- ASNE
- BAS
- CSP
- DA
- DAN
- DHS
- FON
- HAN
- J
- MBBN
- NSA
- NSE
- PAN
- prEN6135
- prEN6087
- S
- SL
- ST
- TAN
- TH
- VFN

Documentation Fraud – How to Recognize it; How to Respond

Lisa Matos and Jared Knights

AVIATION RECORDS INTEGRITY

Red Flags in Aircraft Records

How questionable aircraft records reveal themselves — and what to verify before you accept the paperwork.

Prepared for the Aviation Suppliers Association Committee

The case study is a real, unredacted example; company names elsewhere are illustrative.

WHY THIS MATTERS

A paperwork problem is a safety problem

In the parts supply chain, the records are the part. A part with a clean pedigree on paper but a paper trail that does not hold up can put an unapproved or life-limited component back on a flying aircraft. These problems rarely look dramatic — they hide in a transposed serial number, a date that can't be true, or a 'scanned' letter that was actually generated last month.

Bottom line: *no single discrepancy is conclusive on its own — but several independent ones that reinforce each other raise serious concerns that warrant a closer look.*

3 layers

Read every record three ways — the page itself, the other documents, and the hidden file metadata.

Minutes

Opening a file's properties takes seconds and can expose a 'historical' record created only days ago.

One mismatch

A single unexplained conflict in a serial, date or party name is reason enough to verify.

HOW TO LOOK

Review every document on three layers

1 · What you can see

Read the page itself. Fonts, line weight and clarity that change mid-document, data that looks sharper than the scan behind it, blank gaps where content was removed, signatures that look 'placed.'

2 · How documents agree

Cross-check the packet against itself and against genuine records. Serial numbers, dates, quantities, PO numbers, party names and addresses should match everywhere — and against public registries.

3 · What the file hides

Open the file properties. Creation/modification dates, the software that produced it, the author, and whether text is born-digital, an OCR layer, or typed onto a scan all tell a story the page can't hide.

The document itself

Spot these by eye — but treat them as prompts, not proof. None is conclusive on its own; each is a reason to look closer before accepting the document.

Wrong form for the OEM Compare the document to the manufacturer's genuine form. The real version may be a different orientation, layout or set of fields — a tag that doesn't match the OEM's actual format is a reason to stop and verify with the manufacturer.

Data typed onto a scan On a genuine scanned letter the whole page is one flat image. If the date, type and serial number are sharper than the page — or added on top of a scan — they were possibly inserted after the fact.

Signs of editing & blank gaps Fonts, sizes, colors or shading that shift unnaturally within one document; box and table lines that are broken, misaligned or missing where content was inserted; or a large blank band where content was deleted before the file was re-saved.

'Placed' signatures Signatures and witness names that render on the page but aren't part of the document — applied digitally through a form platform. There is no way to confirm the named person actually signed.

RED FLAG DETAIL · 2 OF 3

The data doesn't agree

When the packet contradicts itself — or the real world.

Serial / part-number conflicts The same unit shown with different serials across documents, or a single transposed digit. A serial of 6250 instead of 2650 doesn't describe a typo — it describes a different aircraft entirely.

Timelines that can't be true An invoice dated before its purchase order. A part shown 'removed' from the aircraft before it was ever installed. A document dated after the day it was actually received.

Quantity & reference mismatches PO says QTY 1, the invoice says QTY 2. Contract numbers that differ only by a hyphen (MAS-2613 vs MAS2613). PO numbers that don't tie out across the PO, invoice and ATA 106.

Wrong-aircraft & identity drift Type stated as A319-100 on one page and A319-133 on the next. 'Customer' and 'Ship To' names that don't match. Company addresses that change between documents from the same party.

The chain of custody breaks

Even if every page looks clean, the trail between owners has to be unbroken.

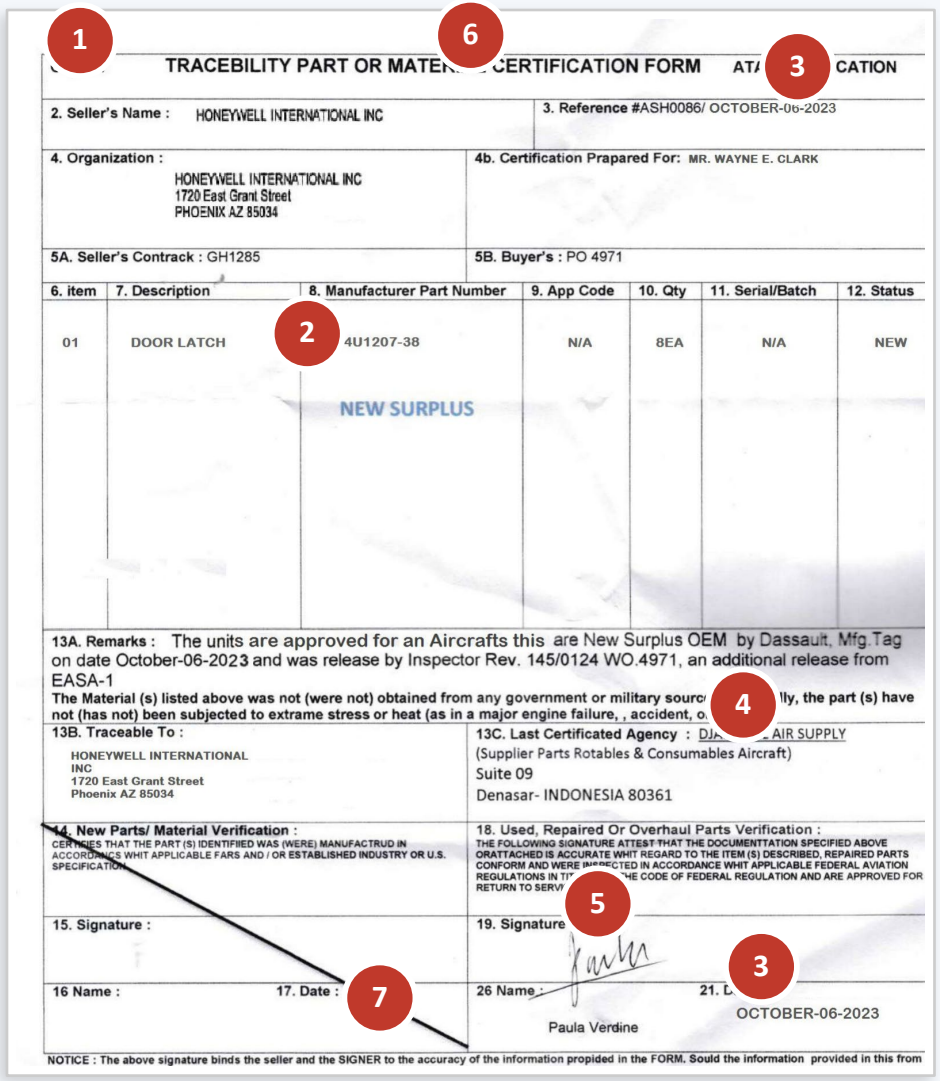
Gaps between owners A genuine record ends at one company, then the part reappears in a different seller's hands with nothing documenting the transfer. The link between the real owner and the party selling is simply missing.

Dissolved or unverifiable parties A seller named in the packet was dissolved years ago, so its statement can never be authenticated. A buyer with no address anywhere in the file can't be confirmed to exist.

Missing removal / teardown tag No tag documenting how, when, by whom and from which aircraft the part was removed. Without it, the part cannot be tied to any airframe — the pedigree is unprovable, not just unproven.

Conflicting maker claims When a part's trace names more than one party as its manufacturer, the claims contradict each other — a part has only one OEM.

A real ATA 106 that won't hold up



TRACEBILITY PART OR MATER CERTIFICATION FORM ATA CATION

2. Seller's Name : HONEYWELL INTERNATIONAL INC
3. Reference #ASH0086/ OCTOBER-06-2023
4. Organization : HONEYWELL INTERNATIONAL INC 1720 East Grant Street PHOENIX AZ 85034
4b. Certification Prapared For: MR. WAYNE E. CLARK
5A. Seller's Contrack : GH1285
5B. Buyer's : PO 4971

6. item	7. Description	8. Manufacturer Part Number	9. App Code	10. Qty	11. Serial/Batch	12. Status
01	DOOR LATCH	4U1207-38	N/A	8EA	N/A	NEW

NEW SURPLUS

13A. Remarks : The units are approved for an Aircrafts this are New Surplus OEM by Dassault, Mfg.Tag on date October-06-2023 and was release by Inspector Rev. 145/0124 WO.4971, an additional release from EASA-1
The Material (s) listed above was not (were not) obtained from any government or military sourc lly, the part (s) have not (has not) been subjected to extrame stress or heat (as in a major engine failure, , accident, o.

13B. Traceable To : HONEYWELL INTERNATIONAL INC 1720 East Grant Street Phoenix AZ 85034

13C. Last Certificated Agency : DJA AIR SUPPLY (Supplier Parts Rotables & Consumables Aircraft) Suite 09 Denasar- INDONESIA 80361

14. New Parts/ Material Verification : CERTIFIES THAT THE PART (S) IDENTIFIED WAS (WERE) MANUFACTRUD IN ACCORDANCE WHIT APPLICABLE FARS AND / OR ESTABLISHED INDUSTRY OR U.S. SPECIFICATION

18. Used, Repaired Or Overhaul Parts Verification : THE FOLLOWING SIGNATURE ATTEST THAT THE DOCUMENTTATION SPECIFIED ABOVE ORATTACHED IS ACCURATE WHIT REGARD TO THE ITEM (S) DESCRIBED, REPAIRED PARTS CONFORM AND WERE INSPECTED IN ACCORDANCE WHIT APPLICABLE FEDERAL AVIATION REGULATIONS IN TI HE CODE OF FEDERAL REGULATION AND ARE APPROVED FOR RETURN TO SERV

15. Signature :

19. Signature

16 Name : 17. Date :

26 Name : Paula Verdine

21. D OCTOBER-06-2023

NOTICE : The above signature binds the seller and the SIGNER to the accuracy of the information propided in the FORM. Sould the information provided in this from

1. **Wrong form — not Honeywell's** This doesn't match Honeywell's standard ATA 106 — a genuine Honeywell tag is landscape and laid out differently. The format alone is reason to verify directly with the OEM.

2. **Edits made after scanning** The page is a scan (the scanner crease is visible), yet data was added on top afterward — those entries aren't part of the original.

3. **Dates from the future** Received August 2023, yet the reference line and Block 21 are dated 6 October 2023 — paperwork dated after it was provided.

4. **Conflicting manufacturer claims** The form credits the part to Honeywell, Dassault and Djambull alike. A part has one OEM; it can't be all three.

5. **Signed in the wrong block** A NEW part is certified in Block 18–19 (Used / Overhauled) while the New-Parts block (14–15) is blank.

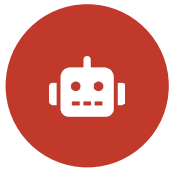
6. **Mixed fonts, sizes & misspellings** Multiple font types and sizes appear throughout, and the form is full of misspellings — "TRACEBILITY," "SPECI FICATION," "MANUFACTRUD," "WHIT."

7. **Mis-numbered field** The block reads "26 Name" where the form should read 20.

LOOKING AHEAD

AI raises the stakes

Many of the tells in these examples — misspellings, mismatched fonts, clumsy edits — exist because the documents were assembled by hand. As generative AI tools improve, altered or AI-generated records will look cleaner, more consistent, and far harder to catch by eye.



Why detection gets harder

- AI can produce flawless, internally consistent paperwork on demand.
- The obvious errors we rely on today — typos, bad formatting — may simply disappear.
- Metadata and cross-document checks still help, but won't catch a polished, carefully built record on their own.

Your best defense: sourcing

- Get to know your suppliers – Vetting processes and vendor approval may find anomilies.
- Companies with third-party quality accreditation — e.g., AS9100 / AS9120, or ASA-100 / FAA AC 00-56 distributor accreditation.
- Favor documented, traceable provenance and known supply chains over the lowest price.

TAKE IT TO THE FLOOR

A 60-second receiving checklist

- Does the document match the OEM's genuine form — right orientation, layout and fields?
- Do PO numbers, quantities, party names and addresses tie out across all documents?
- Is data added on top of a scan, or crisper than the page behind it? Suspect edits made after scanning.
- Is the chain of custody complete, and are all named makers/agencies actually linked to this part?
- Do serial and part numbers match across every document — and the part itself?
- Is the source reputable and third-party accredited, with the removal / teardown tag present?
- Put the dates in order: PO → invoice → packing slip → removal/install — and confirm nothing postdates the day it was received.
- Do the visuals hold up — consistent fonts and line weight, no inserted lines, no unexplained blank gaps?

THE BOTTOM LINE

One flag is a question. Several reinforcing flags are an answer.

When the paperwork doesn't hold together, slow down. Don't accept the records as presented — request complete, original chain-of-custody documents and the part's removal tag, and independently verify any party you can't confirm. As AI makes altered records harder to spot by eye, the surest protection is buying from reputable, third-party-accredited suppliers. When doubt remains, decline and escalate.

Government Affairs Update

Government Affairs: ASA Projects

Trying to Make Sense of 8130.21J

- 8130.21J became effective on November 25, 2025
- The Order required DARs to include the “CM project number” for the part’s DAH
- The draft order had proposed including “*the FAA PAH’s name and production approval number*” and ASA opposed this because this information is not generally available

8130.21J Status

- ASA brought this to the attention of FAA about a week after the guidance became effective
- After a meeting, the FAA promptly issued guidance to clarify the requirement:
  - AIR-600-DM46 (January 15, 2026)
  - Authorizes a DAR “to enter the FAA’s PAH name and to omit the Certificate Management (CM) project number in block 12.”
  - “The deviation will remove the requirement to include the CM project number in paragraph’s 11.d.(3) and 11.l.(2).”

ICA ARC

- Large Aviation Rulemaking Committee (ARC) examining Instructions for Continuing Airworthiness (ICAs)
  - FAA has published guidance asserting that ICAs must be made available
  - Some OEMs argue that ICAs are proprietary
  - Many air carriers and MROs in the ARC complain about lack of availability of ICAs, and about incompleteness
  - *ICA unavailability can inhibit competition in the MRO market, which can impact ASA members who obtain repairs or overhauls on articles*
- Expect the committee to produce a significant report, soon
  - Large and unwieldy reports sometimes fail to result in any FAA action
  - There are still ongoing discussions

AC 00-56

- An AC 00-56 revision has been subject to FAA development
  - ASA filed comments addressing major issues in advance of the FAA draft (generally consistent with ASA-100)
    - Defining “Certified True Copy”
    - Adding requirements for shipping inspection processes
    - Adding requirements for recurrent training
    - Clarifying shelf-life control
    - Process for mutilation of scrapped parts
    - Auditor Training
- We have been told that AC 00-56 revisions are held up because of Paperwork Reduction Act concerns

Cooperation with IATA

- ASA has been working with IATA on several projects
  - IATA guidance on acceptance of aircraft with PMA parts and/or DER repairs (cooperative effort with the leasing community)
  - Life Limited Parts Guidance (update to IATA guidance and additional efforts by the Chaput subcommittee which will be discussed this afternoon)
  - Potential changes to the ASA-100 database to make it easier for IATA to mine this data for inclusion in their MROHub

Aviation Supply Chain Integrity Coalition (ASCIC)

- Michele Dickstein represents ASA on the ASCIC Board
- ASCIC is forming subcommittees and is seeking volunteers
  - Vendor Accreditation/Supplier Certification
  - Document Verification/Traceability
  - Non-Serialized Parts Traceability
- These are based on the three chapters fo the ASCIC Report
  - Discussed during past ASA Quality Committee Meetings
- Volunteers would need to coordinate their activity with ASA
- ASA needs to provide names of potential members this week, so please let us know while you are still here (at the conference) if you think you would be interested (and which committee you'd like to join)!

Other Compliance Projects

Hazmat Compliance

- Compliance training and support are still an ASA priority
- We still answer lots of hazmat questions
- *We continue to provide low-cost training to the community*
  - Sept 8-9, 2026

Export Compliance

- US export compliance (BIS, DDTC, and OFAC rules) continues to be a major concern for the global industry
  - US export enforcements are leading to jail time for parts distributors
  - Iran, Russia and Belarus continue to be the focus
  - We are starting to see 744.7 come up more as a topic of CBP conversations (threats) when they seize goods upon export
- *Jason, Clara, Lisa and Jared will be hosting export compliance workshops during the conference!*
  - Export Compliance: Monday at 2:00 pm in Four Seasons 1-3
  - Real Issues, Real Fixes: Monday at 4:00 pm in Four Seasons 4

15 C.F.R. 744.7

- When exporting parts for installation on a foreign aircraft you must identify
  - The country of registry
  - The country where the aircraft is located (e.g. where part will be installed)
  - The country of the operator
- And treat each of these countries as if it were a destination for compliance analysis purposes
- Result: members need end user information for their export transactions

Current Status of Tariffs

Aircraft Parts

IEEPA Tariffs

- Held illegal by the Supreme Court
- Ordered refunded by the Court of International Trade
- A refund mechanism has been put in place
  - You have to affirmatively apply for your refund
  - ASA has issued guidance on how to file for your refund (in our blog)
- The Administration is appealing on the grounds that the courts do not have the power to order a refund

Worldwide Base Tariff of 10%

- Applicable tariffs + 10% (9903.03.01)
- The “+10%” does **not** apply to many aircraft parts (9903.03.05)
  - You need to read the appropriate lists to ascertain the limitations
  - Fasteners and other hardware items are among the things likely to remain subject to the +10% tariff
- The “+10%” tariff was held illegal by the Court of International Trade
  - This is on appeal
  - On June 11, the Federal Circuit stayed the injunction, explaining that *the government has a likelihood of success on the merits*
  - Tariff is still being collected while the appeal remains pending

Materials Tariffs, Effective June 8

- Aluminum (10-25%)
  - Most likely affecting fasteners and other hardware (*but not all fasteners*)
  - Affects certain radar parts, certain electrical parts, certain insulation fittings
  - **Affects certain aircraft parts for use in *defense* aircraft (8807.30.0060)**
- Iron and Steel (10-25%)
  - Most likely affecting fasteners and other hardware (*but not all fasteners*)
  - May affect some interiors and galley articles
- Copper (10-25%)
- Most raw materials will be affected, but many aircraft parts are outside the scope of these tariffs

Import Education

- ASA/AFRA has an import workshop on Tuesday
- 8:30 am in Four Seasons 4

- One of the focus areas will be on proper classification, because that is very important for compliance

International Adoption of Accreditation

Accreditation – International Adoption

Who has formally adopted accreditation into their system:

- CAAC – Information Bulletin IB-FS-MAT-001 R1 (Sept. 16, 2020)
- EASA – EASA GM3 145.A.42(b)(ii)
- FAA – *Voluntary Industry Distributor Accreditation Program*, Advisory Circular 00-56B, Change 1 (April 6, 2024)
- UK CAA – UK CAA GM3 145.A.42(b)(2)

Who is looking into adoption?

- Transport Canada - likely to issue something for comment in 1Q2025; wants to be able to announce something at ASA/AFRA 2026
- ANAC (Brazil) is starting to show interest
  - Attended ASA QC Meeting in December

FAA – EASA Agreement Updates

- EU-sourced ALTERNATE documentation standards
- Parts accompanied by a document issued by the organization that manufactured the part, which declares the conformity of the part with its design data, and
  - The part is identified in the DAH ICAs as “the consequences of a non-conformity with its approved design data has a negligible safety effect on the product on which it is installed”
    - Corollary to the FAA Commercial Parts Rule
  - The part is identified pursuant to CS-STAN as having the above negligible safety effect
    - Parts supporting standard repairs for CS-23 aircraft

FAA – EASA Agreement Updates

- US-sourced ALTERNATE documentation standards
- A U.S.-based Part 145 repair station may release a component when the installed parts bear:
  - Traceability to the FAA-approved Production Approval Holder
  - Documentation confirming conformity to its approved design
    - "Examples of this documentation include purchase orders, shipping documents, certificates or statements of conformity, part markings, technical or design data (or a combination thereof)"
    - *EASA representatives have orally stated that they expect traceability in this case to be Back-to-Birth traceability*

New Special Conditions

- SMS is now a special condition for Part 145 repair stations
  - EASA 145 repair stations must have a “voluntary “ SMS

- Cybersecurity (*future special condition*)
  - Regulation (EU) 2023/203: *Requirements for the management of information security risks with a potential impact on aviation safety for organisations and competent authorities*
  - A new Part IS (information security) under the EASA regulations
    - Meant to pave the way for cyber-resilient aviation
  - Applies in the EU since 22 February 2026
    - Applies to CAMOs and 145s
    - *Expected this to be applied to US-based EASA 145s as a special condition in the future*

NDAA Language for Use of Civil Aircraft Parts

- Public Law 119-60, section 832(b)
- In the December 18, 2025 National Defense Authorization Act, the Defense Department was directed to consider FAA-approved PMA parts and FAA-approved DER repairs
  - For military aircraft that have a **civil equivalent**
  - Subject to a uniform evaluation and acceptance methodology across all services
  - Without requiring an additional or separate review, approval or certification from the Department of Defense
- DLA is working on the Source Approval Request process

Thank You!

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Facility/Inventory Security Requirements

and formation of a subcommittee to discuss and develop solutions

Jared Knights

ASA-100 Proposed Change – Security Requirements

Formation of a Subcommittee to review Facility, Inventory and Documentation security needs

- Recent events, including aircraft parts thefts, have revealed supply chain threats related to the security of both parts and their documentation. ASA realized that the ASA-100 standard may inadequately address these emerging security threats. The security threats can also reflect safety issues, because the documentation associated with stolen parts may not correctly reflect their condition. This is the genesis for establishing this working group, and possibly updating the standard to reflect the evolving safety and security needs of the aviation distribution industry.
- Review and clarify section 3 B: Distributors that engage in aircraft/component maintenance, as well as part sales, shall secure the storage area to prevent unauthorized access.

ASA-100 Proposed Change – Security Requirements

Items to be considered but not limited to are:

- Distributors shall secure the storage area(s) for parts and for parts documentation to prevent unauthorized access.
  - To be included in this discussion is facilities that share physical space with another business or business activity.
  - The original language of 3B was to prevent cannibalization between repair station employees and distributors inventory
  - What is “unauthorized access”
- Electronic documentation shall be subject to appropriate security measures.
- Subcommittee Lead to work with ASA QC Leadership on defining project and deliverable dates.

Clarifying the Requirement for Caps and Plugs

and formation of a subcommittee to discuss and develop solutions

Jared Knights

ASA-100 Subcommittee to Review Section 8F and proposed language change

The existing language of ASA-100 section 8(F) currently has language about storage of parts:

F. Storage of Parts: The distributor quality system shall assure that serviceable parts/components are adequately protected against the environment and damage by being properly wrapped, packaged, boxed, etc., as appropriate. All fluid passages, lines, or electrical connections shall be capped or plugged. The distributor's quality system shall protect items whose performance will be adversely affected by an "unclean" environment.

ASA-100 Subcommittee to Review Section 8F and proposed language change

Issues to be discussed regarding 8F

- Caps and Plugs and alternative methods of protecting material in a manner to preclude damage
- Serviceable v. Unserviceable
- Consistency in requirements between Receiving, Material Control, Shipping
- Subcommittee Lead to work with ASA QC Leadership on defining project and deliverable dates.

SMS – Value for Members

Safety Management Systems: Discussion of ideas about how ASA could add value in anticipation of customer inquiries about distribution SMS

Safety Management Systems (SMS)

- A formal system for managing safety and compliance
- Four major pillars
  - **Safety Policy**: Planning, assignment of responsibilities, and identification of safety goals
  - **Safety Risk Management**: Hazard identification, risk assessment, and mitigation
  - **Safety Assurance**: Monitor and evaluate safety performance to ensure compliance with safety standards
  - **Safety Promotion:** Training and Communication

SMS Discussion Points

- Are you using SMS?
- Do you forsee implementing SMS?
- What would you like to see ASA do to support SMS?
  - Examples:
  - Training on SMS?
  - Hosting a “crowd-sourced” database of identified hazards?
  - Hosting a “crowd-sourced” database of successful mitigations/processes?
  - Implementing elements of SMS in ASA-100?

Update on the LLP Group

Sherry Chaput

ASA Statement 2020: Formation of A Subcommittee to Discuss and Develop Changes

Jared Knights, David Damron

ASA Statement Form 2020 Subcommittee

- Purpose Statement — ASA Statement Form 2020 Subcommittee
  - The purpose of the Aviation Suppliers Association ASA Statement Form 2020 Subcommittee is to review the current version of the ASA Statement Form 2020 and identify opportunities for improvement that reduce risk, enhance clarity, and strengthen its usefulness across the aircraft parts distribution industry. The subcommittee will evaluate the form's currency, intended use, structure, and implementation challenges to determine whether revisions, clarifications, or supplemental guidance are warranted.
- Key Considerations for the Review
  - The form was last revised in October 2021 and may require review for continued relevance and alignment with current industry practices.
  - The form is intended to serve as a standardized industry document enabling sellers to convey essential information about aircraft parts and materials in an unambiguous manner.
  - The current format limits users to documenting a single condition per form, which may affect usability in certain operational contexts.
  - The form provides an alternative to the ATA Specification 106 Part or Material Certification sample, incorporating explicit language from the IATA Incident Clearance Statement.
  - Users have reported confusion regarding the instructions for completion and difficulties integrating the form into ERP systems, indicating potential areas for clarification or redesign.
  - Additional considerations may be identified during the subcommittee's work.

Thank You to our Sponsor

Thank You!

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