

DOCUMENT REVIEW LOG

1. Document No.: Draft AC 21-29D	2. Project Manager: AIR-112,	3. Reviewing Office: Consolidated Public Comments	4. Date of Review:	5. Date of AIR-100 Disposition: July 31, 2015
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Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by AIR-100 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

Block 5: To be completed by AIR-100 PM, after receiving comments from field offices. Enter date of disposition.

The below columns are to be completed by the Field Offices, except for the "AIR-100 Disposition" column.

AIR-100 PMs disposition comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as one of the following:

- Adopted
- Partially Adopted
- Non-Concur
- Concur but Outside of Scope (Will be considered in next change/revision)
- Answer to Question or Statement.

**AC 21-29D
Public Comments**

AIRBUS

See Below

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	1 & 2 audience	<p>The AC states: This AC is applicable to all personnel involved in producing, selling, and distributing aircraft parts and to all persons who remove, repair, overhaul, or install aircraft parts.</p> <p>Would not it be appropriate to stick with the traditional wording in US regulations such as "[...] perform maintenance, preventive maintenance or alterations."</p>	to avoid misunderstanding and have clarity	<p>Replace : This AC is applicable to all personnel involved in producing, selling, and distributing aircraft parts and to all persons who remove, repair, overhaul, or install aircraft parts.</p> <p>This AC is applicable to all personnel involved in producing, selling, and distributing aircraft parts and to all persons who perform maintenance, preventive maintenance or alterations</p>	<p>Adopted: (AFS-320 verified content).</p>
2.	1 & 5 detection of Sups	<p>The AC states: The airworthiness of aeronautical products may be in question if the design and quality of the parts are unknown.</p> <p>Are the design and 'quality' (what does quality mean?) the only aspects important in this discussion?</p>	Could the in-service history of parts (e.g. for life-limited parts) may also be important?	Text to be reviewed	<p>Partially Adopted: Changed to read: "The airworthiness of aeronautical products may be compromised if a part's approval status is suspect or unknown."</p>
3.	1 & 5 detection of Sups	<p>The AC states: Positive identification of unapproved parts can be difficult if the parts display characteristics similar to that of an approved part</p> <p>What does similar mean?</p>	For sake of understanding	Text to be reviewed.	<p>Partially Adopted: Changed to read: "Positive identification of unapproved parts have proven to be difficult because they can closely resemble approved parts."</p>

6.	2 & 522 Supplier evaluation	<p>A distributor or supplier's inability to provide substantiating documentation that the part was produced in accordance with an FAA approval or inspected, repaired, overhauled, preserved, or altered, pursuant to 14 CFR, part 43</p> <p>The part may be also rebuild</p>	For sake of completeness	<p>Replace sentence by "A distributor or supplier's inability to provide sub-stantiating documentation that the part was produced in accordance with an FAA approval or inspected, repaired, overhauled or rebuild preserved, or altered, pursuant to 14 CFR, part 43."</p>	<p>Adopted</p> <p>(AFS verified content)</p>
7.	3 & 522 Supplier evaluation	<p>The AC states: Traceability to approved design and production approval should be requested by purchasers on their purchase orders for all parts intended for use on TC products.</p> <p>Could the FAA explain how to proceed when explicit traceability requirements are still not enforced, even for life-limited parts? Could the FAA take the example of a part not permanently marked with a serial number? How to proceed with raw material?</p>	For clarification	Text to be complemented with clarifications.	<p>Answer to Question:</p> <p>The AC clearly states that traceability information "should" be requested, not that it is a requirement. It is only a recommendation. Also, ACs are voluntary, not mandatory.</p> <p>Raw materials are not considered approved parts and are not subject to SUP reporting according to FAA order 8120.16 revision due out in 2016.</p>

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8.	3 & 522 Supplier evaluation	<p>The AC states: This AC describes a system for the voluntary accreditation of civil aircraft parts distributors based on voluntary industry oversight</p> <p>Is there an equal treatment between distributors and organizations holding a certificate? What are distributors exposed to?</p>	Can distributors lose an organization approval like any other actor in the aviation community (like DAH, PAH, operators, repair stations, etc...)?	Ensure equal treatment between all aviation stakeholders	<p>Answer to Question: Distributors are not directly mentioned in the regulations. Federal regulation, 14 CFR, part 21, pertains to manufacturers and suppliers. However, a change to part 21 recently published in the federal register, adds a definition in § 21, Subpart A, for “Supplier” that includes “...any person (and companies) that provides a product, article, or service at any tier in the supply chain.” This should improve the accountability of distributors and fairness in the treatment of all organizations.</p>
9.	3 & 532 Receiving inspection	<p>The AC states: Verify that the actual part and delivery receipt reflect the same information as the purchase order regarding part and serial number.</p> <p>What are the FAA recommendations for parts not permanently marked with a part number and a serial number?</p>	For improvement and clarification	Text to be reviewed	<p>Answer to Question: 14 CFR part 45.15 “Marking requirements for PMA articles, TSO articles and Critical parts,” provides the guidance for marking of parts. Parts that are too small for marking must have the information attached to the part or its container.</p> <p>Parts that do not comply with the regulations should be rejected during receiving inspection.</p>
10.	3 & 533 Receiving inspection	<p>The AC states: Verify that the identification on the part has not been tampered with (e.g., serial number stamped over, label or part/serial numbers improper or missing, vibro-etch or serial numbers located at other than the normal location).</p> <p>How to know the normal location?</p> <p>Could malicious people falsifying markings have the same access to the documentation providing such information as approved organisations?</p>	For improvement and clarification	Text to be reviewed	<p>Answer to Question:</p> <ol style="list-style-type: none"> 1. These conditions or anomalies are only examples to look for while doing a receiving inspection. The conditions are prefaced with an “e.g.” (exempli gratia) meaning “for example.” 2. Question: ... how to know the normal location? That is dependent on the technician’s knowledge and experience. It also includes data to be provided by the Original Equipment Mfr. 3. Question on falsifying markings is speculative, or rhetorical in nature. No answer required.

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11.	3 & 534 Receiving inspection	<p>The AC states: Ensure that the parts' shelf life and/or life limit has not expired, if applicable.</p> <p>Could the FAA explain how to ensure this when traceability of in-service history of life limited parts was not required at the entry into service of affected parts?</p>	For improvement and clarification	Text to be reviewed	<p>Answer to Question:</p> <p>While the regulations do not require explicit "traceability," they do require knowledge on "current status" of life limited parts. This means that the time (or cycles) of life limited parts must be known prior to installation and the referenced paragraph is correct as written.</p>
12.	3 & 534 (5.3.5) Receiving inspection	<p>The AC states: European Aviation Safety Agency (EASA) or Transport Canada Civil Aviation (TCCA) Authorized Release Certificate (equivalent to FAA Form 8130-3) Maintenance records or release document with approval for return to service.</p> <p>There is a major difference between FARs and the EASA Part-145: In Europe, the Authorized Release Certificate is used in maintenance to release the work accomplished (or postponed), not to release the physical item(s) that have been maintained. It implies that the need for documentation may not be limited to an EASA Form 1 and associated detailed maintenance records.</p>	For improvement and clarification	Text to be reviewed	<p>Reviewed paragraph 5.3.5 (not 5.3.4) as requested.</p> <p>Changes:</p> <ol style="list-style-type: none"> 1. Remove phrase: "equivalent to FAA Form 8130-3"- from para 5.3.5. 2. Add bullet; "Repair station work order from an FAA-certificated source. 3. Add "Form 1" after "EASA" and "Form One" after "TCCA" in bullet.
13.	4 & 538	<p>The AC states Note: For purposes of this order, the term "part" does not include raw materials</p> <p>Order or AC?</p>	For clarification	Review the text	<p>Adopted:</p> <p>Change "order" to "AC"</p>

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14.	4 & 538	<p>The AC states Note: For purposes of this order, the term “part” does not include raw materials</p> <p>What are the FAA recommendations for raw materials?</p>	For clarification	Complement the text with clarifications	<p>Answer to question:</p> <p>Recommendation is not appropriate. Screening of raw materials to ensure they meet required criteria specified by the manufacturer’s purchase order, are the sole responsibility of the manufacturer. As such, raw materials content and quality fall under the manufacturer’s internal quality system.</p>
15.	4 & 54	<p>The AC states: AC 20-62 was published to promote compliance with FAA regulations and to offer further guidance and clarification relevant to the eligibility of aeronautical replacement parts.</p> <p>Is the word ‘promote’ adequate? Does compliance with FAA regulations need to be promoted (and is the publication of an AC the right means)?</p>	For sake of eliminating possibilities of extensive interpretations and use of adequate means for conveying/enforcing/explaining (etc...) regulation requirements	Text to be reviewed	<p>Answer to Question:</p> <ol style="list-style-type: none"> 1. Yes, “promote” is adequate 2. Yes, compliance needs promotion 3. Yes, an AC is one correct method among others.
16.	6 & 9.1 Unapproved parts	<p>The AC states: The FAA established the SUP Program to address the issue of “unapproved” parts entering the U.S. aviation system.</p> <p>Can the FAA tell what is done to prevent the export of SUP from US to the other aviation systems (e.g. Europe, Asia, Africa, etc...)?</p>	For clarification	Text to be reviewed	<p>Answer to Question:</p> <p>Although the FAA has no jurisdiction in Europe and other countries mentioned, the agency regulates and promotes compliance and uses enforcement when necessary on manufacturers and suppliers within its jurisdiction. If other countries wish to establish a program that mirrors the FAA SUP program, (and several do) they are free to review the guidance and procedures promoted by FAA and devise a program that fits their regulatory structure.</p>

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17.	6 & 9.4	<p>The AC states: The FAA employs a national reporting system (FAA’s Hotline Program) to respond to the potential of unapproved parts entering the aviation system at the supply and repair level of aircraft maintenance.</p> <p>What about those for which there may be an attempt to export?</p>	For clarification	Text to be reviewed	<p>Answer to Question: See answer to #16 above.</p>
18.	9 appendix A	<p>The appendix states: 4. Record the serial number on the part, if applicable.</p> <p>The serial number to be recorded should be the one marked on the part.</p>	For clarification	<p>Replace by 4. Record the serial number marked on the part, if applicable.</p>	<p>Non-Concur: No value added, the instruction on FAA Form 8120-11 is adequate and needs no clarification.</p>
19.	12 appendix B 14	<p>The appendix states:</p> <p>Distributors. Brokers, dealers, resellers, or other persons or agencies engaged in the sale of parts for installation in type certificated (TC) aircraft, aircraft engines, propellers, and appliances.</p> <p>Is there an equal treatment between distributors and organisations holding a certificate? What are distributors exposed to? Would this be a weak link in the supply chain?</p>	For clarification	Text to be reviewed	<p>Answer to Question:</p> <ol style="list-style-type: none"> 1. “Equal treatment,” - See answer to item #8. 2. Weak link: Speculative/rhetorical , no answer offered.

National Air Transportation Association (NATA)

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	Pg 1 para 5	Airworthiness	For consistency with other policy and regulations, Please stay with the definition of AW	May be in question if the product does not meet its type design and not safe for operation.	Non-concur: This sentence in para 5 is not a redefinition of "Airworthiness." It is a general statement indicating the importance of ensuring parts installed in type certificated aircraft are airworthy. The AC does not define "Airworthiness."
2.	Pg 1 para 5	May be in question if the design and quality of the parts are unknown	Stay consistent with the regulation and the SUP order.	Please reiterate that an approved part not maintained IAW part 43 doesn't mean it is a SUP, it is a violation of part 43. The same language is in the SUP order.	Partially Adopted: The definition of Suspected Unapproved part in appendix "B" contains this point in the Note: "An approved part used in the wrong application must be addressed as a potential part 43 violation. It should not be reported as a SUP."
3.	Pg 4 para 5.3.8	Include consumables in with raw materials	Consumables are included when discussing raw materials	Add consumables.	Partially Adopted : The definition of Suspected Unapproved Part in Appendix "B" contains examples in the "Note" – i.e., "sealants, lubricants" to indicate this point.

Aviation Suppliers Association (ASA)

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	Pg – 2 Para 5.1	The inclusion of PAH supplier evaluation considerations is out of place and adds potential sources of confusion to the guidance	<p>1. PAH is a person who not only holds a production certificate, but also controls the design and quality of a product or part. The PAH is therefore in a position to identify any non-conforming materials, parts, or subassemblies prior to their incorporation into a completed airworthy part. Being in such a position allows the PAH to ensure quality of the parts it produces under its PC and identify any part that does not conform to the approved design prior to the completed part entering the supply chain. This mechanism, although important, is out of place in guidance related to the detection of SUPs and is better addressed by the PAH's quality system and through guidance such as AC 21-43.</p> <p>2. Second, the inclusion of supplier evaluation procedures could cause confusion among a significant percentage of the parties to whom AC 21-29 is intended to apply. These parties are typically third-party distributors and purchasers of aircraft parts to with the PAH supplier evaluation requirements do not apply. These parties may read paragraph 5.1 as requiring them to undertake evaluations and selections of other suppliers, which is unnecessary for third-party purchasers of completed parts. This would draw important quality resources away from the actual detection and reporting of SUPs.</p>	We recommend the omission of paragraphs 5.1 and 5.1.1 because they are not specifically necessary for the detection, identification, and reporting of SUPs and could lead to confusion. If necessary, cross references to ACs 21-43, 20-154, and 20-62 should be used.	<p>Non-Concur</p> <p>This AC is voluntary but also is pertinent to “Producers” of parts, as clearly stated in para 2. “Audience.” Para 5.1 simply reiterates the requirements for PAHs as presented in part 21.</p> <p>Para 5.1.1 is pertinent to procurement of aviation parts and is retained as a reference for any facility that elects to set up a Receiving Inspection System. Clear language indicates it is optional for non-PAH holders that wish to create a supplier evaluation function. It is not mandatory for repair and other non PAH facilities. ACs (20-62 and 20-154) are useful references offered as guidance only.</p>

2.	Pg – 2 Para 5.2.1	Paragraph 5.2.1 states that a procurement procedure should have methods to identify distributors and suppliers with a documentation system to ensure traceability to an approved source, but fails to refer to AC 00-56.	<p>Paragraph 5.2.1 articulates the first step in a procurement process intended to detect, identify, and report if necessary, suspected unapproved parts. The paragraph explains that a person purchasing aircraft parts should have in place methods of identifying distributors and suppliers who have a documentation and receiving inspection system that ensures traceability to an FAA-approved source.</p> <p>One such method would be to rely on distributors accredited under AC 00-56. Distributors accredited under AC 00-56 must meet certain minimum quality standards that exceed that required by the Federal Aviation Regulations, undergo regular audits, and are listed in a continuously updated database of accredited distributors for ease of reference.</p> <p>AC 00-56 accredited distributors must have quality systems that ensure parts documentation accurately reflects industry safety requirements. This documentation also helps in the detection of SUPs. AC 00-56 accredited distributors must have a receiving inspection process that confirms parts are accompanied by traceability documentation to a source, a procedure for removing and quarantining suspect or nonconforming material identified during receiving, and processes for maintaining documentation.</p> <p>Although not every purchaser will obtain parts from an AC 00-56 accredited distributor, the AC 00-56 database is an effective way to identify distributors who have the required documentation systems in place.</p>	Insert the following sentence in paragraph 5.2.1: “One such acceptable method is use of the FAA AC 00-56 database, which compiles a list of accredited distributors whose traceability meets minimum standards described in that Advisory Circulator.”	<p>Adopted.</p> <p>Added following sentence to paragraph 5.2.1.</p> <p>“ FAA AC 00-56, <i>Voluntary Industry Distributor Accreditation Program</i>, contains a list of accredited distributors whose traceability meets minimum standards described in that AC. See “Note” in paragraph 5.2.2 below.”</p>
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3.	Pg – 2 Para 5.2.2	<p>Paragraph 5.2.2 presents a bulleted list of questionable fact patterns that may raise questions, however many of these bullets simply reflect the distribution industry business model. The list is neither exhaustive nor conclusive, and the questionable fact patterns can easily be resolved by sound screening methods and due diligence. Rather than present as questionable the practices that are actually benefits of the aviation distribution community, the guidance should focus on suggesting screening methods and avoid condemning situations which in many cases go to the very essence of the benefit offered by third-party aviation parts distributors and suppliers.</p> <p>Continued below:</p>	<p>Paragraph 5.2.2 states the procurement process must have methods for screening unfamiliar distributors or suppliers to determine if the parts present a potential risk of being unapproved. The paragraph then presents a bulleted list of fact red flags that may raise questions; however in many cases these red flags actually reflect the business model of the aviation distribution community.</p> <ul style="list-style-type: none"> - The first bullet suggests that a quoted or advertised price that is significantly lower than that quoted by other distributors or suppliers is a red flag. Although this may sometimes be the case, a significantly lower price is not dispositive of the approval status of a part. - These prices may be significantly below what other distributors (and especially OEMs) may quote or advertise, because the distributor has taken the time, investment, and risk of loss to offer airworthy parts at steeply reduced prices from the rest of the market. This low-pricing model is very common in the aviation distribution community. <p>Significantly Shortened Delivery Schedule: The second bullet suggests that a delivery schedule that is significantly shorter than other distributors or suppliers is a red flag. However, one of the key roles distributors play in the aviation supply chain is maintaining inventory on the shelf when OEMs and other suppliers may claim incredibly long lead times.</p> <ul style="list-style-type: none"> - Maintaining an inventory of parts on the shelf when OEMs do not have parts available is the exact role distributors play in the aviation industry. One of the key reasons operators turn to third-party distributors is to source parts that the OEM may no longer support, for which the OEM claims an unreasonable lead time, or which are prohibitively expensive due to OEM-driven scarcity. - By maintaining otherwise hard to find parts on the shelf, distributors are able to respond to AOG situations and help operators keep their aircraft airworthy at reasonable prices and with reasonable lead times. The ability to respond quickly to a customer’s need is not a red flag, but is rather the 	<p>We recommend eliminating the bulleted list of red flags, which in many cases should not be viewed as red flags, and instead replacing the list with guidance for screening unknown vendors as an entity, rather than focusing on discrete transactions.</p>	<p>Non-Concur</p> <p>The commenter uses the inflammatory term “red flags” (found nowhere in the AC) to enhance the argument that such a list is not only unnecessary but may be detrimental to the supplier companies. The comment makes no allowance for negative outcomes that occur regularly and is the main reason for the creation of the SUP program.</p> <p>The list of situations are presented simply to enlighten the reader to examples of situations that may cause some concern and should be further researched before blind acceptance. The commenter takes exception to each situation with examples offered for rebuttal.</p> <p>The commenter must be advised again that the AC is purely voluntary and that these included situations are to only meant to enlighten a parts buyer to be aware of things that may indicate potential problems and to be on guard when questions are raised in the procurement process. The bullets do not recommend or even suggest that these situations are grounds for ceasing to do business with a supplier or distributor.</p> <p>Continued below:</p>
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<p>3. Cont'd</p>			<p>Traceability to Approved Design and Production Approval The final bullet in the list under paragraph 5.2.2 presents two separate issues.</p> <p>The first issue is quickly addressed: This bullet does not appear to be a red flag situation, and so was probably intended to be a paragraph following the bulleted list, and not actually a bullet itself. The bullet reads:</p> <p>“Traceability to approved design and production approval should be requested by purchasers on their purchase orders for all parts intended for use on TC products.”</p> <p>This is clearly not a red flag, but rather an instruction to ensure traceability documentation and so more appropriately belongs in the form of a narrative paragraph or sentence following the bullet list.</p> <p>The second issue is that the paragraph does not follow current industry practice. The instruction demands traceability to approved design and production approval. Traceability all the way back to the design and production approval is not in line with current industry practice. FAA AC 00-56 Voluntary Industry Distributor Accreditation Program, the guidance specifically applicable to the accreditation of the distribution community, defines traceability and includes the minimum traceability standards a distributor must satisfy to earn accreditation under AC 00-56. AC 00-56 defines “Traceability” as follows:</p> <p>Tracking parts, processes, and materials to a source. For an accredited distributor, traceability must meet the minimum standards found in the documentation matrix in Appendix 1. (emphasis added). The documentation matrix describes the various minimum standard of traceability documentation necessary for different categories of parts. Although some requirements may ultimately result in a trace to the design and production approval, the documentation matrix does not require such traceability.</p>		<p>Concur: Traceability bullet was not intended to be a bullet. It will be resituated.</p> <p>Continued below:</p>
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<p>3. Cont'</p>			<p>The industry standard for traceability documentation is traceability to a specific source. Very frequently this source will be the last operator on whose aircraft a part was installed. These operators do not typically have trace documentation back to the design and production approval. Such a requirement would therefore be virtually impossible in most cases for any used part, as the traceability trail would go cold at the last aircraft operator.</p> <p>Additionally, over the past several decades, a series of FAA Chief Counsel's Opinion Letters have specifically stated that traceability back to the design and production approval are not required under the regulations.</p> <p>The inclusion of a different requirement for traceability documentation—namely to the design and production approval—other than what is already required for accreditation in the distribution community could cause significant confusion as well as create a virtually impossible requirement based on current industry norms.</p>	<p>We recommend relying exclusively on the AC 00-56 guidance (referenced in the note to paragraph 5.2.2) and the AC 00-56 documentation matrix to establish the appropriate traceability documentation requirements for a particular category of parts.</p>	<p>Partially Adopted:</p> <p>To make reference to the AC 00-56 guidance, specifically the matrix in appendix 1 of the AC for traceability.</p> <p>Following sentence to be added to the paragraph.</p> <p>“In order to establish the appropriate traceability documentation requirements for a particular category of parts, please refer to the Documentation Matrix in Appendix 1 of FAA AC 00-56.”</p>
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4.	Pg. 2. Para 5.2.2	<p>Issue</p> <p>The list of situations identified in paragraph 5.2.2 that may raise questions can often be resolved through ordinary due diligence. The guidance as written does not offer any suggestions that the situations as presented in many cases are standard industry practices that can be quickly resolved.</p>	<p>Paragraph 5.2.2 and the bullet list of situations that could lead to questions appears to imply that such fact patterns will almost always lead to suspected unapproved parts. As discussed above, many of the fact patterns listed go to the very essence of the distributor business model. Without clarification, such language could cause confusion among aircraft parts purchasers and result in purchasers believing that many aircraft distributors are dealing in unapproved parts, simply because the parts distributors are offering are offered at reduced prices or are available on the shelf.</p> <p>Although certain facts can indicate red flags when purchasing aircraft parts, a review of the part history, company history, traceability documentation, and use of an FAA designee can help to clear those red flags and confirm for the purchaser that the aircraft part is approved or can be returned to an airworthy condition.</p> <p>More important than pricing or lead times in determining the status of a particular part is knowing the supplier. Paragraph 5.2.2 acknowledges this by requiring a set of methods to deal with unfamiliar suppliers; but the paragraph does not provide samples of methods for dealing with unfamiliar suppliers. Instead, it provides a list of questionable situations. Although such examples may be useful in very specific scenarios, they are not a substitute for a holistic system intended to screen suppliers and establish trusted relationships and confidence in part and documentation authenticity.</p>	<p>If the bullet list of questionable fact patterns is retained, we suggest inserting a paragraph following the final bullet point explaining that red flag fact patterns can often be resolved through due diligence. We propose the following language:</p> <p>“This list is not conclusive and is not intended to imply that such situations will always lead to unapproved parts. In many cases a purchaser can confirm that the parts are approved parts or can be returned to an airworthy condition through ordinary due diligence.”</p>	<p>Adopted:</p> <p>The following sentence will be added at end of paragraph 5.2.2.</p> <p>“The situations presented above are not conclusive and the FAA does not intend to imply that such situations will always lead to unapproved parts. In many cases a purchaser can confirm that the parts are approved parts or can be returned to an airworthy condition through ordinary due diligence.”</p>
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5.		<p>Paragraph 5.3.5 should reference FAA AC 00-56</p> <p>Issue Paragraph 5.3.5 discusses visual inspection of a part and supporting documentation and references AC 20-62. Distributors accredited under AC 00-56 are already competent in such inspections and so use of 00-56 distributors should be encouraged.</p>	<p>Distributors accredited under AC 00-56 have a clear understanding of the requirements of AC 20-62. Accredited distributors also have receiving systems in place as part of a comprehensive quality assurance program. Purchasers of aircraft parts who do not have such a system in place are likely to be less competent in performing the necessary inspections and document review.</p> <p>One option to solve the issue of competence among parts purchasers is to encourage those purchasers to rely on accredited distributors listed in the AC 00-56 database. Accredited distributors must have approved quality systems in place. Accredited distributors undergo regular surveillance audits from accreditation organizations that are themselves audited by the FAA. Finally, because accredited distributors deal in significant quantities of aircraft parts, both as buyer and seller, accredited distributors are uniquely positioned to have an optimal understanding of the parts approval and in identifying and detecting SUPs before they reach an operator.</p> <p>Although performing inspections of parts and documentation upon receipt is an important element of SUP detection, purchasers of aircraft parts can benefit from relying on accredited distributors who are well-versed in SUPs detection and undergo regular auditing.</p>	<p>Include a reference to FAA AC 00-56 and encourage use of a 00-56 accredited distributor.</p>	<p>Non-Concur.</p> <p>FAA AC 00-56 is referenced in several places in the preceding paragraphs where pertinent.</p> <p>In para 5.3.5, the specific issue presented is that of conducting a visual inspection of the actual part in the “Receiving Inspection” section of the AC. When the part is received, the reader is instructed to look for specific features (i.e., PMA and or TSO markings). AC 00-56 has no specific guidance in this area. The reference to FAA AC 20-62 is the correct guidance for this function. Change is unwarranted.</p>
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