



The Update Report

The Airline Suppliers Association

Volume 8, Issue 4

April 2000

IMPORTED PARTS

New FAA Policy Could Violate FAA Regs

Don't believe everything you read.

The FAA has recently issued a policy memorandum that suggests that it is illegal to import a part that does not bear an airworthiness approval issued by the foreign government.

Don't believe everything you read.

More to the point, be prepared to question government policies that obviously make no sense. While many nonsensical government policies are unfortunately enforceable, every now and then the government issues a policy that just cannot be enforced.

The FAA recently issued AIR-200 Policy Memorandum 2000-01. It is entitled "Clarification of the Eligibility of Imported Parts for Installation on U.S.-Registered Aircraft." Unfortunately, it seems to do more than merely clarify eligibility concerns. It declares that large categories of parts (used safely on a daily basis) will be considered "suspected unapproved parts." If taken at face value, it also appears to preclude anyone in the industry from purchasing imported parts from distributors! Neither of these "policy" positions can be supported under the present FAA regulations.

Airworthiness Approvals

The policy memo states that the United States will only accept materi-

als, parts, or appliances imported to the United States for installation on U.S.-registered aircraft when the imported materials, parts, or appliances are accompanied by a completed airworthiness document (e.g., JAA Form One) from the originating country's civil aviation authority. It states that parts that do not bear this documentation are suspected unapproved parts.

The policy memo is allegedly based upon the imported parts rule found at 14 C.F.R. § 21.502. That rule addresses parts that were certified as airworthy by a foreign country. It states that the FAA may treat these parts as if they had been found in compliance with the Federal Aviation Regulations by the FAA itself.

Nowhere in the rule does it say that imported parts that are not certified by a foreign nation are unairworthy.

In fact, there are large categories of imported parts that are considered airworthy despite the fact that the foreign government does not issue an airworthiness approval for them. Standard parts may be manufactured anywhere in the world, and they do not require an airworthiness approval from any government. Electrical connectors are just one example of standard parts that may be manufactured abroad.

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For their reaccreditation to the Airline Suppliers Association's Accreditation Program - there are five other companies that share this honor - see page 41 for the rest of the list of this month's reaccreditees!

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A Message from ASA's President

After reading this month's cover article you might be wondering what was the alleged problem with imported parts that AIR-200 needed to write a clarification Memorandum. We wondered the same thing.

Apparently, the problem is that some foreign repair stations that operate under U.S. repair station licenses [145 (C) licenses] have been using foreign-made parts in their repairs. They argue that these parts are not "imported" parts because they never crossed a national border.

This argument misses the key point: the concern at the time of installation is "airworthiness," not approval. The FAA import rules provide one method by which a part can be considered airworthy, but it is by no means the only method. Therefore, a discussion

of the import rule was inappropriate to fix the problem. The solution to a repair station problem should have been one that focused on the application of the maintenance performance rules.

As the cover article states, FAA personnel admit that there are problems with the memo. If there are problems with the Memorandum, then why is it still in circulation? It is a shame that the authors of Policy Memorandum 2000-01 do not exhibit pride in their work and withdraw this clearly flawed Policy Memorandum.

At the time of this publication, ASA has asked the FAA [AIR-200] to rescind the Memorandum. I will keep you posted.

Best Regards

Michele Schweitzer

ASA Annual Membership Meeting

The Airline Suppliers Association, Inc., a Delaware not-for-profit corporation, will hold its annual membership meeting on June 27, 2000, 8:00 am at the Four Seasons Hotel in Las Vegas, NV. If you have questions, please contact Michele Schweitzer or Jason Dickstein at (202) 730-0270.

ASA 2000 Elections

At least two positions on the ASA Board of Directors will be open for election in 2000. ASA Members interested in running for these positions should submit nominations to ASA. Nominations should include the name, company name, and contact information for the nominee.

Nominations are due no later than 5:00 pm Eastern Time on June 9, 2000. Ballots will be distributed on or about July 3, 2000.

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The Update Report is a monthly newsletter of the Airline Suppliers Association. Questions/comments should be addressed to:

Jason Dickstein
Airline Suppliers Association
1707 H Street, NW, Suite 701
Washington, DC 20006
voice: (202) 730-0272
fax: (202) 730-0274
email:
jason@airlinesuppliers.com

The Update Report provides timely information to help Association members and readers keep abreast of the changes within the aviation supply industry.

The Update Report is just one of the many benefits that the Airline Suppliers Association offers members. For information on ASA-100, the ASA Accreditation Program, Conferences, Workshops, FAA guidance like Advisory Circulars, Industry Memos, or services and benefits, contact the Association.

The Update Report For information on special package rates for advertising, contact the Association at (202) 730-0270. Subscription cost is \$120.00 US per year.

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Have you registered yet for this year's Airline Suppliers Association Annual Conference?

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Monday Morning General Session

Keynote Presentation by Kenneth Mead, the Inspector General of the United States Department of Transportation

Industry Update – Jason Dickstein, ASA

The European Marketplace – Harold Jones, JAA

Hazardous Materials and the Legal Hazard It Can Cause You – Marshall Filler, Filler & Weller, PC

Monday Afternoon Workshops (Select 2)

Interest-Based Negotiation – Kaye Shackford, The Mattford Group

Aviation Investigations—Protecting your Business – Harry Schaefer, US DOT OIG

Internal Auditing—Maximizing the Value of Audits – Jason Lewis, ASA & Deborah Kammers, ASA

Manufacturing Issues Affecting Distribution—TSO vs. PMA – Bruce Kaplan, FAA & Terry Pearsall, AEA

Part Marking – Jon Andresen, United Airlines

ILSmart.com - Jim Sdoia, ILS & Mark Pinsley, ILS

ATA SPEC 2000 – Brad Balance, ATA & Michael Sandifer, Continental Data Graphics

Tuesday Morning Workshops (Select 2)

Keeping Your Rat Pack Out of Court: Employment Law for Owners and Supervisors – Jason Dickstein, ASA

The Ins and Outs of Accreditation—Doing it ASA's Way – Jason Lewis, ASA & Deborah Kammers, ASA

FAA Recent Advisory Guidance – Ken Reilly, FAA & Al Michaels, FAA

Aviation Data: Propriety, Approval and Misappropriation – Paul A. Lange, Attorney

Supplier/Vendor Performance Tracking — The Why; The What; The How To – George Ringger, Solair, Inc.

ILSmart.com - Jim Sdoia, ILS & Mark Pinsley, ILS

ATA SPEC 2000 – Brad Balance, ATA & Michael Sandifer, Continental Data Graphics

Tuesday Afternoon General Session

Update from the FAA – Ken Reilly, FAA

Financial Evaluation of Your Aircraft Parts
Agnew, Morten, Byer & Agnew

Inventory – Robert

E-Commerce—The Way of the Future – Michael Ward, PriceWaterhouseCoopers & Spencer Lin, PriceWaterhouseCoopers

Industry Panel Discussion – You don't want to miss this one.

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This is a partial agenda. For the full agenda and registration form, see ASA's web site or call and ask the Association to mail/fax the full conference agenda.

Airline Suppliers Association, 1707 H Street, NW, Suite #701, Washington, DC 20006
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CONFERENCE SCHEDULE

Saturday, June 24, 2000 3:00 PM – 6:30 PM Registration
Sunday, June 25, 2000 7:30 AM – 9:00 PM Golf, Registration, Welcome Dinner
*Monday, June 26, 2000 6:30 AM – 9:30PM Registration, Breakfast, Exhibits, Conference, AM/PM Break, Lunch, Exhibits, Workshops, Reception & Dinner Banquet
*Tuesday, June 27, 2000 6:30 AM – 4:15 PM Member's Only Breakfast Meeting, Exhibits, Workshops AM/PM Break, Lunch, Exhibits, General Session

(*All events on Monday & Tuesday are at Four Seasons Hotel)

WORKSHOP SCHEDULE

Monday - June 26, 2000
PM SESSION ONLY (90 minutes)
2:00 PM – 3:30 PM
4:00 PM – 5:30 PM

Circle 2 Workshops
(A) Interest-Based Negotiation
(B) Aviation Investigations
(C) Internal Auditing
(D) Manufacturing Issues
(E) Part Marking
(1) ILSmart.com
(2) ATA SPEC 2000

Tuesday - June 27, 2000
AM SESSION ONLY (60 minutes)
9:00 AM – 10:00 AM
10:30 AM – 11:30 PM

Circle 2 Workshops
(F) Employment Law for Owners
(G) The Ins and Outs of Accreditation
(H) FAA Recent Advisory Guidance
(J) Aviation Data
(K) Supplier/Vendor Performance
(1) ILSmart.com
(2) ATA SPEC 2000

SPOUSE/COMPANIONS? Guest name: _____
Sunday and Monday evening social events are included in Spouse/Companion registration fee. (A Spouse/Companion is one who does not work for a company that qualifies for membership in the ASA)

For information on children's activities, contact ASA.

PHOTOCOPY THIS FORM FOR ADD'L REGISTRANTS. MAINTAIN A COPY FOR YOUR RECORDS. CONFIRMATIONS WILL BE FAXED TO REGISTRANTS.

CANCELLATION POLICY - All conference cancellations must be received in writing. Cancellations before May 20, 2000 will be charged a \$75.00 service fee. There will be no refund for cancellations received on or after May 20, 2000. There will be no refund for golf tournament cancellations by registrants. If the golf tournament is cancelled by the golf course a percentage of the golf fee will be refunded.

New Hazmat Focus at RSPA

There are roughly 300 million hazardous materials shipments in the nation each year and the vast majority of these shipments arrive at their destinations safely. In 1998, there were 15,322 reported hazardous materials incidents, including 429 serious incidents; 13 deaths; and 198 injuries.

The Department of Transportation recently conducted an audit of its hazmat enforcement mechanisms to determine their adequacy. It was conducted by the Research and Special Programs Administration (RSPA), which is the primary agency for establishing hazmat shipping policy for the government (RSPA, like the FAA, is one of the agencies that makes up the Department of Transportation). The study found that the Administration has a relatively good safety record, in light of the large number of hazmat shipments but it concluded that there remains a great potential for catastrophic incidents in the transportation of hazardous materials.

The Future of Hazmat

The Department of Transportation forecasts that the total tonnage of hazardous materials produced will grow by 2 percent per year in the near fu-

ture. Growth in the amount of hazardous materials transported by air, however, could be as high as 8 percent per year. The Department sees the potential risk to the public increasing proportionately, unless the Department establishes effective safeguards.

RSPA found that there was significant room for improvement in the areas of coordination and strategic planning. While better use of government resources is an important abstraction, what is important to the industry is the question of *how* those resources will be better used. Several specific programs were suggested as mechanisms for improving hazmat awareness and preventing hazmat problems.

Increase Education

Traditionally, the Federal Government was a source of enforcement activity but not of education. Throughout the twentieth century, though, the Federal Government has continued to change its focus to include and embrace educational programs as a core element of good government.

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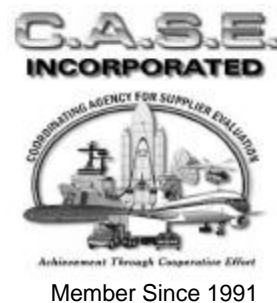
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Parts that were originally manufactured without the intention that they be used in aircraft (commercial parts), like many light bulbs, do not need any airworthiness approval to be imported in the United States, nor is airworthiness traceability a requirement to install these parts.

Foreign-made parts for aircraft produced abroad are not always accompanied by foreign airworthiness approval documents. JTSO parts, manufactured under JAA technical standard orders, typically are not accompanied by airworthiness approvals in most cases. In fact, they fall outside the scope of our agreements with some countries – this does not change the fact that they may be necessary components in aircraft bearing U.S. airworthiness certificates, nor does it change the fact that their airworthiness may be determined by the installer.

Aviation is a global business. Because of the volume of foreign parts upon which we rely to keep our aircraft in the air, we cannot cut-off the flow of foreign parts into the United States. Following the plain language of the policy memo would bring aviation to a staggering halt.

No Distributors Allowed

The 2000-01 policy memorandum also provides lists of acceptable sources for parts. It states that “Replacement and modification materials, parts, or appliances must be received from” (1) the type certificate holder, (2) a company holding direct ship authority from the type certificate holder, (3) a holder of another U. S. production approval (e.g. PMA/TSOA), or (4) a manufacturer in a bilateral country with which the U.S. has an appropriate bilateral agreement.

Distributors are not included in this list. By using the term “must,” the FAA effectively precludes the industry from purchasing parts from distributors. For example, an air carrier that wished to purchase an Airbus part would be forced to purchase that part directly from Airbus, or from a manufacturer with direct ship authority. It would be a violation of this policy memo to buy the same part from a distributor of Airbus parts.

The FAA does not have any regulations to support this preposterous restriction. This proposal could never be implemented as a regulation because it would cripple the industry, which relies on the availability of parts through distributors. It is utterly unenforceable.

Why?

Why does the FAA publish these ridiculous policy memoranda? It is

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hard to say. Clearly, FAA headquarters is not subjecting its own work product to the same rigorous standards that the industry expects of itself.

Many in the Aircraft Certification Service would like to develop a world-wide system of documentation, where every part bears traceability documentation from cradle to grave. While this could be a benefit to the industry, the infrastructure for such a system just does not exist. The FAA cannot even make airworthiness approvals available for parts manufactured in the United States.

Foreign governments are not any better prepared to issue airworthiness documents for standard and commercial parts destined for the United States. It is ridiculous to believe that we can force foreign standard and commercial part manufacturers to obtain airworthiness documentation from their governments by issuing a

policy memo that restricts Americans from using these otherwise airworthy parts.

If such a policy was proposed as a regulation, the FAA would have to impose airworthiness approvals requirements on all parts (including standard and commercial parts). A policy like that of PM 2000-01, that was limited to only foreign parts would very likely be declared a violation of United States trade agreements with our foreign trading partners and could even incite a trade war. Clearly, though, requiring installers to only use standard and commercial parts that bear airworthiness approvals (when no such documentation is available) would be ridiculous. It is distressing that the FAA would issue a policy memorandum of this sort.

Plan of Action

ASA has been in contact with the FAA about this issue. FAA personnel have agreed that there may be prob-

lems with this policy memorandum, but despite these platitudes, the policy memorandum remains as a valid memorandum on the FAA's website.

ASA members can be certain that their Association will not permit this sort of document to remain unchallenged. Anyone experiencing specific problems should contact ASA.

In the mean time, ASA members who are faced with customer's questions should remind their customers that the AIR-200 Policy Memorandum has no legal effect. It is published as internal FAA guidance only. While it has become common to treat FAA policy memoranda with the same industry effect as advisory circulars, policy memos are not advisory circulars, and this one should not be treated as binding in any way on non-FAA personnel.

In other words, let your business partners know that they shouldn't believe everything they read.

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RSPA recommended two particular focal areas for education. First, increase the requirements for hazmat education throughout the industry. At present, any company in the industry with employees who may ship or receive hazmats is required to assure that the employees are trained at least once every three years. RSPA would like to see this regulation strengthened.

The other target for educational improvement is the traveling public. Often, travelers may unwittingly bring hazmats aboard an aircraft. RSPA realizes that it must improve its outreach programs aimed at the traveling public by better educating passengers on what materials are hazardous and should not be carried aboard, or placed in stowed luggage on planes, trains, and buses.

Increase the Focus on Shippers

The RSPA study found that shippers

of hazardous materials generally receive less attention from the hazmat enforcers than carriers. The distributor who packages the hazmat is in a much better position to properly package and identify the material than is the carrier. The authors of the final report believe that shippers offer the greatest opportunity to improve safety.

The report calls for the Department of Transportation to develop strategies that focus government resources more on high-risk or problem shippers. While an educational movement might seem most appropriate, the report calls for "targeted outreach and inspection activities," which are more likely to appear as an enforcement mechanism, rather than as a cooperative mechanism.

The RSPA report suggested developing "strike force inspection" teams, made up of representatives from several transportation modes (aviation, marine, highway, rail, etc.). This

would permit hazmat investigators to share their knowledge while also providing a mechanism for detecting and addressing hazmat problems.

While the regulatory mechanisms are being improved, criminal enforcement against shippers is already occurring. In one of the most recently concluded cases, a company President was convicted for shipping the toner found in laser printers.

Criminal Sanctions for Hazmats

On April 13, a U.S. District Court judge in Miami sentenced Alpa International, Inc. and its president, Alejandro O. Craig, to 3 years' probation for illegally delivering flammable hazardous materials to an air carrier at Miami International Airport. The court also ordered Craig to report for deportation proceedings and to pay \$4,920 in restitution to the Miami-Dade County Police Department's Environmental Investigations Unit.

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Hazmat Prosecutions on the Rise

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The investigation began when employees of Lanchile discovered that they were loading 81 boxes of laser printer toner fluid (which is flammable). The discovery was made last July when the employees were loading the goods on an aircraft bound for Asuncion, Paraguay.

Investigators determined that the pallets containing the toner had previously been marked with hazardous material placards. Alpa had re-wrapped the pallets in opaque plastic to protect them. The opaque plastic obscured the placards. Upon delivery to Lanchile, Alpa did not provide any documentation required for hazardous material shipments, nor did Alpa provide any documents identifying the shipment as hazmat.

Lanchile discovered the concealment when they broke down one of the pallets to make it fit in the cargo hold.

William Tompkins, Atlanta regional special-agent-in-charge for the DOT Office of the Inspector General explained "Shipping companies that engage in the intentional concealment of hazardous materials endanger the public. The Departments of Transportation and Justice will continue vigilant and aggressive efforts to detect, investigate and prosecute violators to the full extent of the law."

Craig's probation, deportation and fine were minor compared to what he could have received for this offense - he could have been subject to a five-year prison sentence and up to \$250,000 in fines.

Large Air Carriers are Not Immune

While the Department of Transportation is trying to focus on shippers, carriers will continue to be targets for hazmat investigations. Because of their size and prominence, they will also continue to face the heaviest fines.

AMR Corp., the holding company that operates American Airlines, plead guilty last December to a federal charge of illegally storing hazardous waste at Miami International Airport. As part of a plea agreement, AMR Corp. will pay a fine of \$6 million and a community-service restitution of \$2 million. American also must undertake a court-supervised program at every airport where the carrier accepts cargo for shipment.

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American operates more than 850 aircraft, but owns no cargo-only planes; as a result, all its cargo shipments take place on passenger planes.

"Today's plea agreement should send a strong message to every link in the aviation-safety chain — to every aviation employee, every air carrier, and every shipper," said DOT Inspector General Kenneth M. Mead; "We are pleased that AMR Corp. has accepted responsibility and has promised to implement a sound and comprehensive compliance program."

Conclusion

Since the Valujet crash in the Everglades, there has been a significant increase in the regulatory attention paid to hazardous materials. Because RSPA is the agency with primary responsibility for hazmat enforcement, RSPA has been a major beneficiary of this attention.

The RSPA report continues to place a heavy emphasis on hazardous material investigation, and it proposes to shift the emphasis away from carriers and toward shippers. This means an increase in attention paid to aircraft parts distributors.

The Airline Suppliers Association published a hazmat poster earlier this year as a receiving inspection aid for identifying material that may represent hazardous materials. The electronic version of this poster is available on the internet. If you don't have a copy hanging in your facility already, we recommend that you

download a copy at your earliest convenience. This year's ASA Workshop features a unit on hazmat training, and this year's ASA Annual Conference will also feature discussion of hazmats. Now is the time to train your employees in hazmats, before the RSPA strike team visits YOUR facility.

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How do you register?

1. Download the ASA Workshop Registration form at <http://www.airlinesuppliers.com> - a complete syllabus is also available at this website.
2. Complete the form.
3. Read and sign the attestation box at the bottom of the page.
4. Fax the form to (202) 730-0274 to reserve your spaces in the Workshop of your choice.
5. Mail a check for the registration fee to ASA.

Registration fee is \$50 per person for US workshops and \$80 per person for UK workshops. The fee includes all workshop materials, snack breaks, lunch and a certificate of participation. Workshops will run from 8:30 am – 4:30 pm.

Find Source Documents on the Internet

Interested in one of the subjects addressed in this issue? Want to find out more? The source documents underlying many of the articles in this issue are available on the internet. Just set your browser for <http://www.airlinesuppliers.com/8tur.html#4>. This address features an index to the articles which will bring you to the original documents on the world wide web just by clicking on the description.

UPCOMING EVENTS

* = *Schweitzer, Lewis or Dickstein will be speaking there*

- May 4** * **ASA Workshop**, Sumner Suites, Tempe, AZ. See Page 39 for details!
May 7-9 **ATA Engineering, Maintenance & Material Forum**, Phoenix, AZ. Call (202) 626-4000 for details.
May 7-10 * **Aircraft Electronics Ass'n Convention & Trade Show**, Reno, NV. Call (816) 373-6565 for details.
May 9-11 * **PAMA/NATA Aviation Services & Suppliers Supershow**, Tampa, FL. Call (202) 730-0260
June 25-27 ** **Airline Suppliers Association**, Las Vegas, NV. Registration forms are now available on our website at <http://www.airlinesuppliers.com>. Call us at (202) 730-0270 for more information!
Sept. 9-12 * **Air Carrier Purchasing Conference**, Nashville, TN. Call (561) 434-1512 or fax (561) 434-1944.
Sept. 13-14 **US Valuation Conference**, Falls Church, VA. Call Commercial Aviation Events: +44 (1892) 515364.
Sept. 25 * **ASA Workshop**, Riverside Hotel, Fort Lauderdale, FL. See Page 39 for details!
Sept. 26 * **ASA Workshop**, Embassy Suites Hotel, Miami, FL. See Page 39 for details!
Sept. 28 * **ASA Workshop**, (site TBA) Atlanta, GA. See Page 39 for details!
Nov. 5-7 **Regional & Corp. Aviation Industry Suppliers Conference**, Rancho Mirage, CA. Call (310) 203-9603.
Nov. 6 * **ASA Workshop**, Wyndham Garden Hotel, Newark, NJ. See Page 39 for details!
Nov. 9 * **ASA Workshop**, (site TBA) London, UK. See Page 39 for details!

The ASA 2000 Annual Conference will be held at the Four Seasons Hotel in Las Vegas, June 25-27. The ASA-negotiated room rate is attractive (\$130) and hotel space is limited. Reservations can be made NOW by calling (877) 632-5000. Don't forget to complete a registration form (see pgs 39-40)

Airline Suppliers Association
1707 H Street, NW, Suite 701
Washington, DC 20006
Telephone: (202) 730-0270
Facsimile: (202) 730-0274

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