

# FAA AFS-300 Aircraft Maintenance Division Update for ASA / AFRA Conference

Presented to: ASA / AFRA Conference Attendees

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Federal Aviation  
Administration



# Overview

- **Remote Supplier Audits**
- **Bilateral Agreements**
- **Mutual Acceptance of Maintenance and Parts**
- **Safety Management Systems (SMS)**
- **FAA Suspected Unapproved Parts (SUPs) Program**



# Remote Supplier Audits

- [AC 00-56](#) requires in person onsite audits
- Remote audit authorization was needed due to COVID travel restrictions
- The remote audit authorization expired on 5/31/2023
- Permanent approach to recurrent remote auditing in situations where it makes sense and there is low risk
- [AC 00-56](#) would need to be revised
- [FAA Order 8900.1, Vol 1, Ch 3, Sec 9](#) Remote Technology Risk Based Decision Making Job Aid
- [www.drs.faa.gov](http://www.drs.faa.gov)



# Bilateral Agreements and Mutual Acceptance of Maintenance and Parts

- Revising bilateral agreements with Canada and Singapore
- Revising the EASA Maintenance Annex Guidance (MAG)
- Drafting a new MAG with Brazil
- No negative impact on industry
- Mutual Acceptance of Maintenance and Parts



# 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
- §145 Repair Stations
- Voluntary Implementation of SMS for MROs and training organizations



# SMS Congressional Legislation

## Aircraft Certification, Safety, and Accountability Act (ACSAA)

- Signed into law December 27, 2020
- Section 102, *Safety Management Systems*
- Requires the FAA to initiate rulemaking to require all manufacturers holding a TC and PC (for a complete product) to adopt an SMS by Dec 27, 2024
- The rulemaking committee expanded the applicability beyond design and manufacturing organizations to include Part 135 operators, and air tour operators conducting operations under 14 CFR 91.147



# SMS Congressional Legislation

An SMS adopted under this section **must** contain:

- **Confidential Employee Reporting System** that includes non-punitive provisions through which employees can report hazards and safety concerns. The confidential employee reporting system must be implemented in a manner consistent with other voluntary reporting programs administered by the FAA Administrator.
- **Code of Ethics**, emphasizing safety as the highest priority for a manufacturer's management and employees.



# 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>**





# FAA Order 8120.16

- 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



# SUPs Definitions


FAA Order 8120.16 defines:

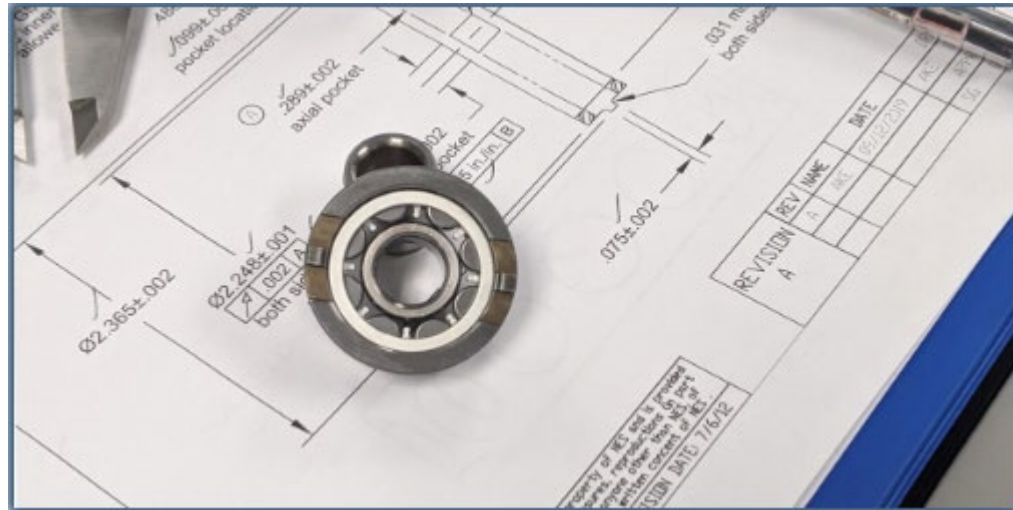
- Approved Part
- Unapproved Part
- SUP

► “Acceptable part” is **not** defined by FAA Order 8120.16



# Approved Parts

- Are eligible for installation on type-certificated products
  - Are produced according to the requirements of 14 CFR part [21.8](#) or [21.9](#)
  - Meet applicable design standards (i.e., conform to type design and are in condition for safe operation)
- 
- A technical drawing of a mechanical part, likely a propeller hub or similar component. The drawing shows a cross-section with various dimensions and labels. Key labels include "2899X.002 axial pocket", "002 pocket", "001 m both sides", and "002". There are also arrows indicating specific features and dimensions. The drawing is a detailed engineering sketch with precise lines and text.



# Unapproved Parts

- **Must not be installed on type-certificated products**
- **Do not meet the requirements of an Approved Part under 14 CFR part [21.8](#) or [21.9](#)**
- **Counterfeit parts:**
  - May be new or used parts misrepresented as meeting the requirements of Approved Parts
- **Direct shipped parts without Authorization from the PAH are unapproved**
- **NOTE: Parts damaged in shipping or having warranty issues may not be eligible for installation, however they should NOT be reported as a SUP**



# 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



# SUPs

- Parts that are not clearly approved
- Parts that require further investigation





# Examples of SUPs

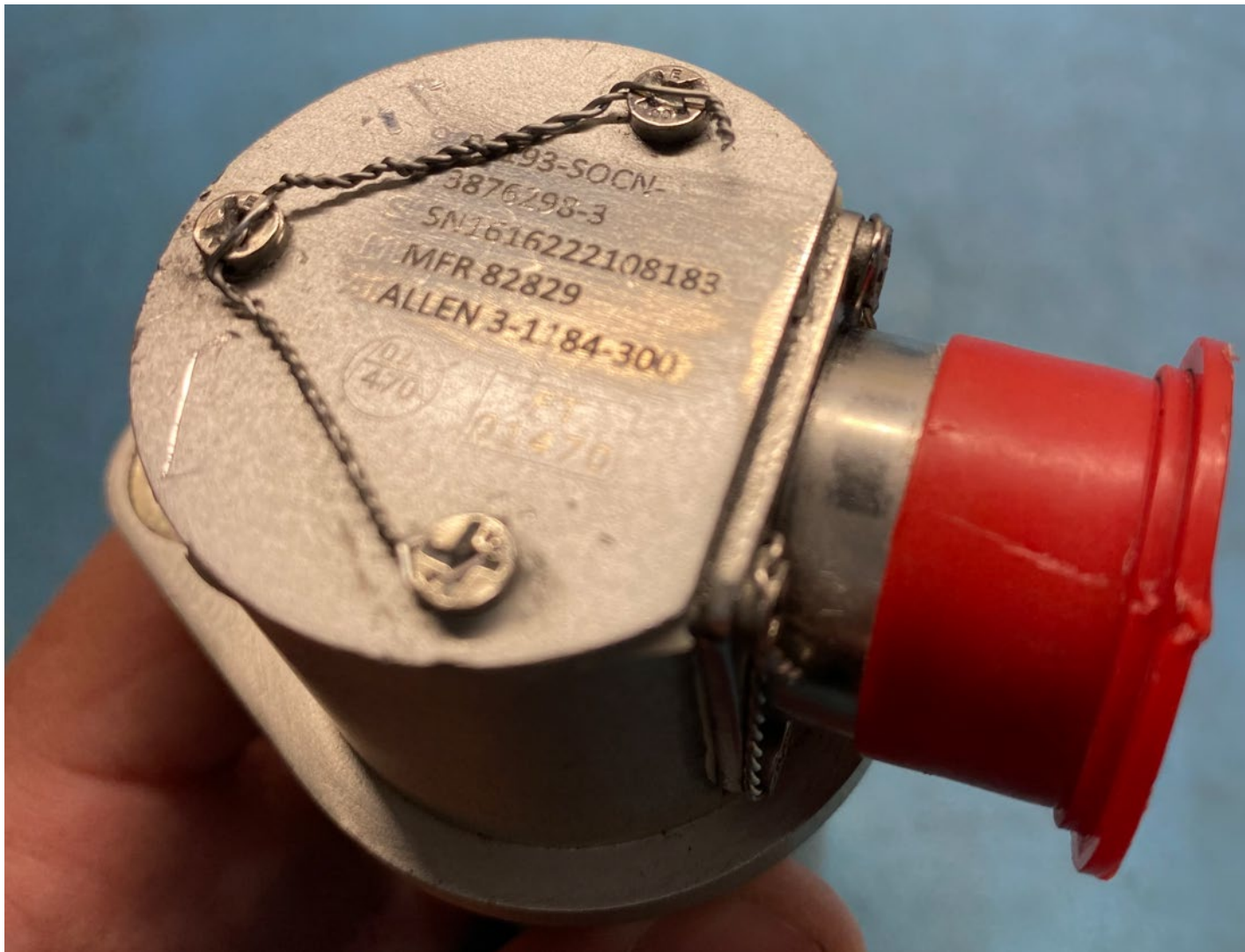


# Examples of SUPs





# Examples of SUPs



# TCAS SUPs - Aviation Parts LLC in Russia

Counterfeit



Real



Federal Aviation  
Administration

# TCAS SUPs - Aviation Parts LLC in Russia

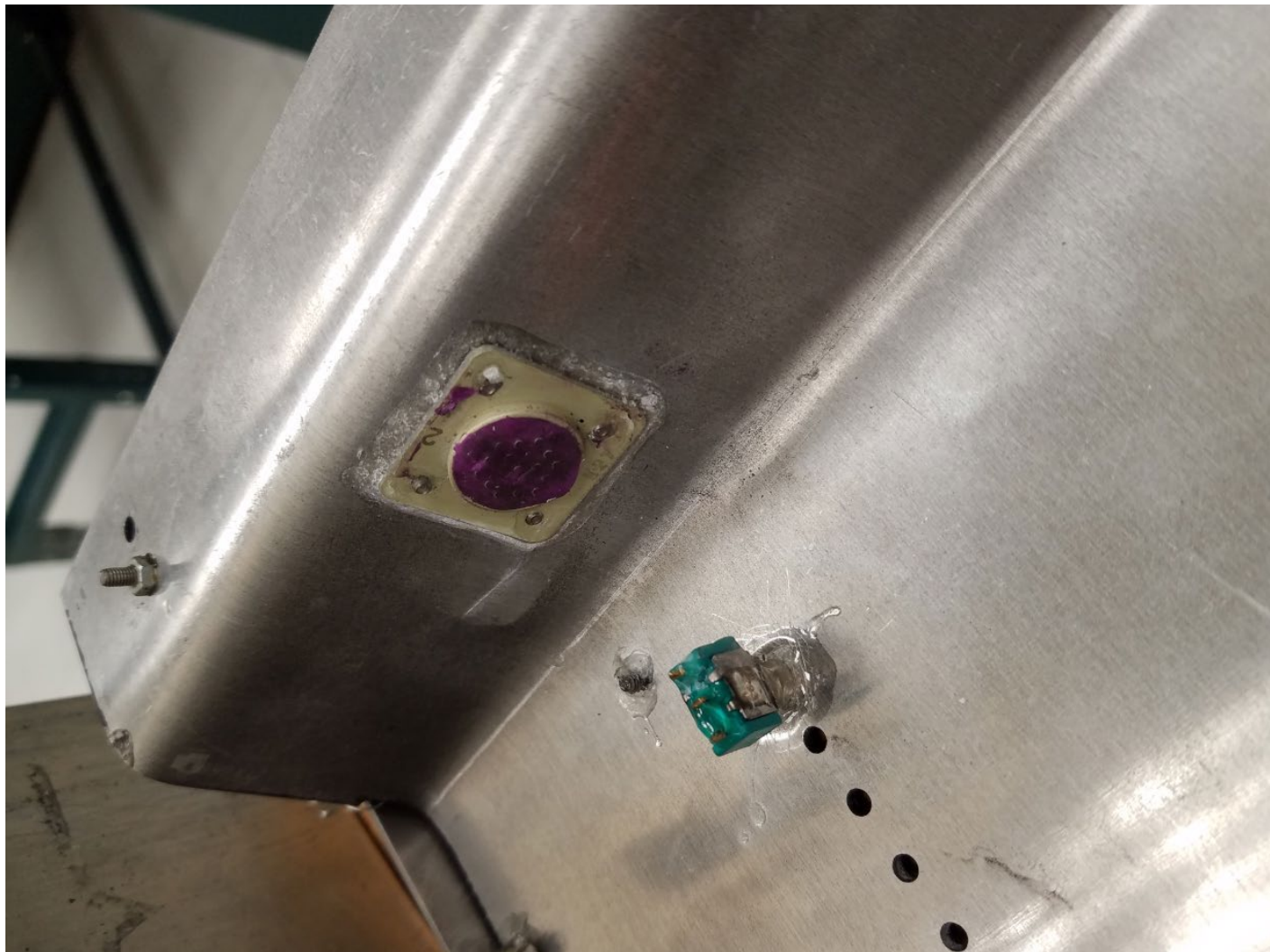
Counterfeit



Real

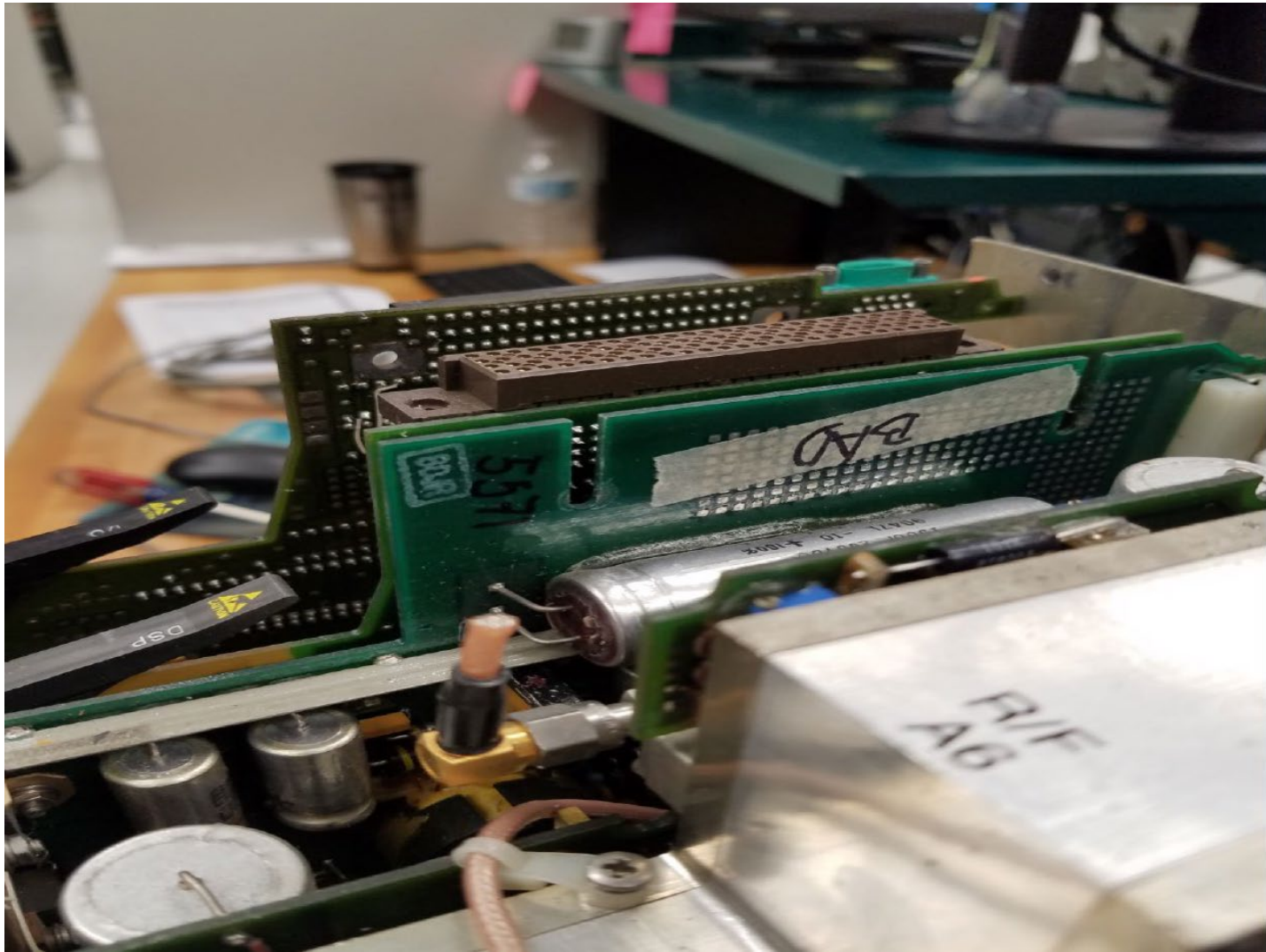


# TCAS SUPs - Aviation Parts LLC in Russia

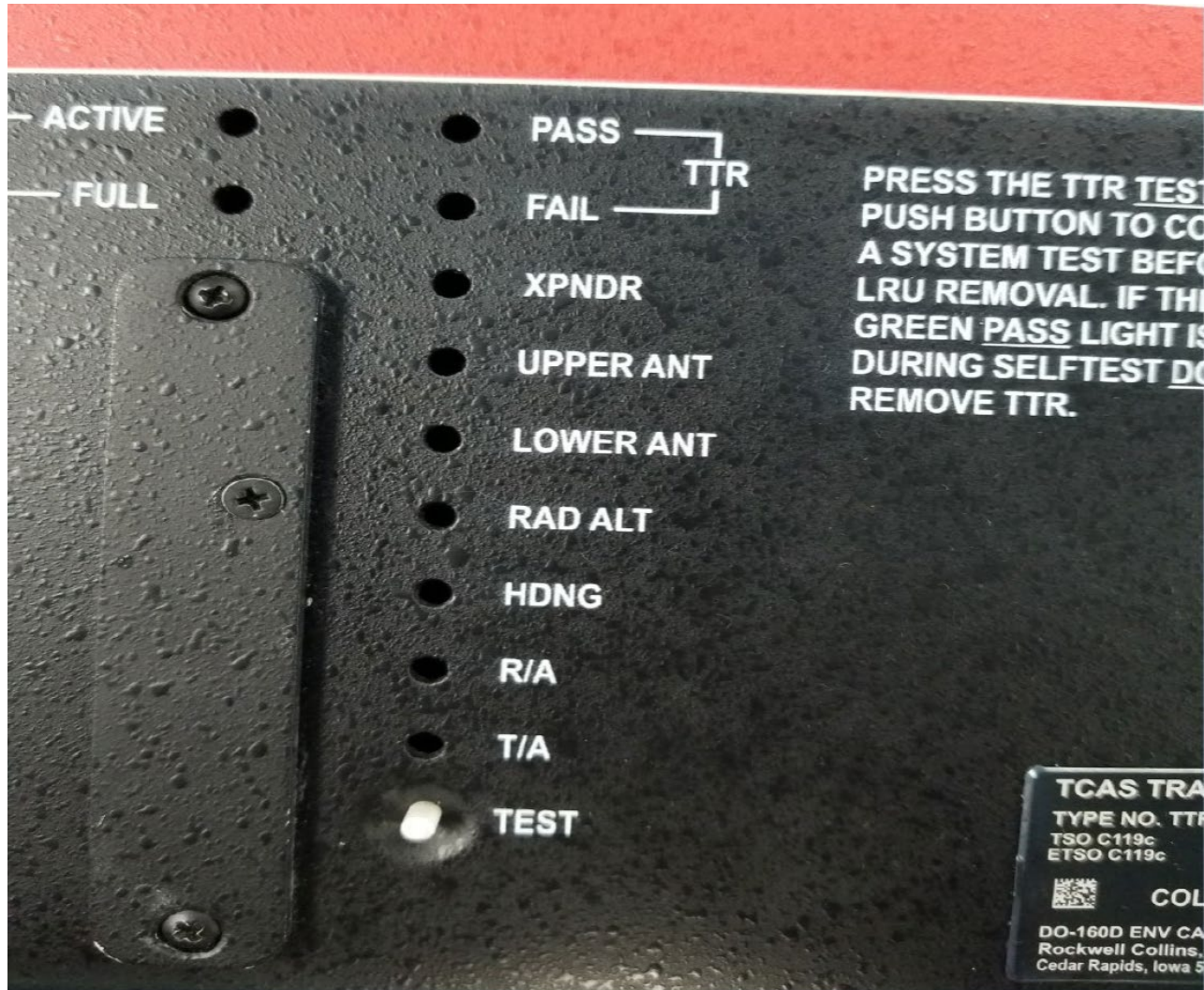




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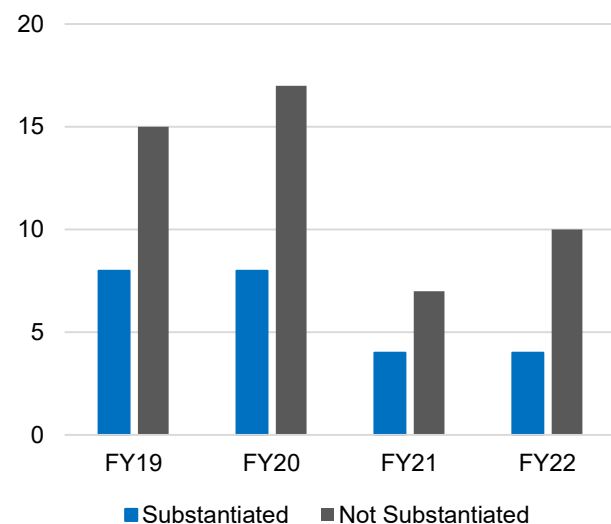


# SUPs Statistics

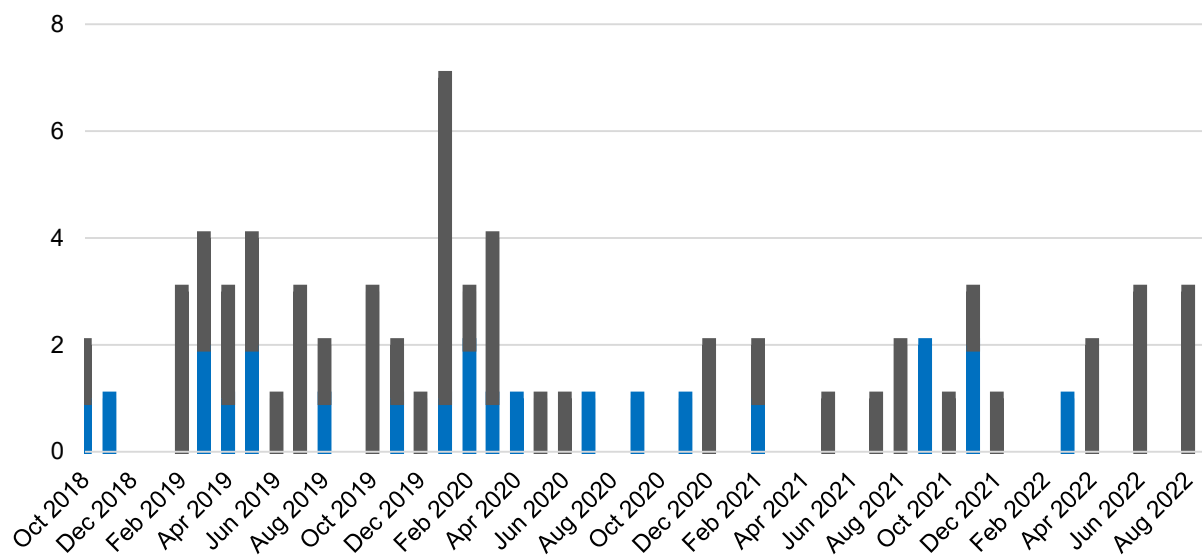
**73**  
Cases Initiated  
FY19 - FY22

**23**  
Cases Substantiated  
FY19 - FY22

SUPs Cases  
(Annually)



SUPs Cases  
(Monthly)



# 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





# Questions

