

Aviation Suppliers Association Accreditation Program (ASAAP) Letter of Interpretation (LI) 100-009

EFFECTIVE DATE: October 1, 2005

REVISION DATE: August 1, 2020

TERMINATION DATE: Until Superseded or Incorporated in ASA-100

ISSUE: Which version of ATA SPEC 300 is acceptable?

AFFECTED SECTIONS: ASA-100 Revision 5.0 §§ 8 (D); 11 (A)

BACKGROUND:

The ASA-100 quality system requires that an accredited distributor meet the requirements of both ASA-100 and the FAA Advisory Circular (AC) 00-56B. ASA has created a tool called a Letter of Interpretation (LI). LIs are used to provide guidance regarding ASA-100 and/or FAA AC 00-56B. LIs are required if applicable to your business. Each LI addresses requirements and future expectations.

Where appropriate, the ASA-100 quality system requires that an accredited distributor use shipping containers that meet the ATA-300 Specification or an equivalent standard. This text is currently found in sections 8 (D)(1) [Material Control] and 11(A) [Shipping]. This requirement is imposed by ASA-100 but is not imposed by AC 00-56B.

In 2000, 2001, 2005, 2006, 2014, and 2020 the Air Transport Association of America (ATA) published Revisions to ATA Specification 300: Specification for Packaging of Airline Supplies. The revisions posed in the 2001 – 2006, 2014 and 2020 revisions provided some clarification and other minor changes and additions, but nothing significant. The 2008 revision added language related to compressed gas containers and oxygen generators, and replaced hazmat classifications with a reference to regulatory documents. The 2014 revision addressed changes to manufacturing of packing material and testing of packing material. The 2020 revision updated the product license agreement, Updated Figure 6.2.1 Packaging of Electro Static Sensitive Devices (ESD) figure, updated 6.3.1 pages 16-17 ESD text to conform with updated ESD figure, and added new chapter 9 and information regarding new category I case maintenance and service. These changes are not typical for a distribution business.

Upon review, ASA has concluded that the substance of the 2001 – 2006, 2014 and 2020 revisions are not appreciably different from the substance of the 2000 revision, and the substantive changes in the 2008 revision are changes that can be found in regulatory documents. Regulations supersede any industry or third-party requirements, which means that companies that have materials that fall into the categories mentioned will be required to meet the regulations referenced regardless of possessing the 2008 or an earlier version of ATA SPEC 300. The regulatory documents referenced regarding packaging Hazardous Material, Dangerous Goods or Restricted Articles are: DOT Title 49, ICAO Doc 9284, IATA DGR, and IMO IMDG. Documents referenced for packaging in the US for transport by air for cylinders containing compressed oxygen, oxidizing gases, and oxygen generators are: DOT 31FP.

Other regulatory documents may need to be reviewed based on a company's business scope, and it is the responsibility of that company to be aware of the regulations that pertain to items they package and ship.

ASA will accept 2000 or later versions of the ATA SPEC 300 when referencing sections 8(D)(1) and 11(A) of the ASA-100 Standard.

To reduce confusion in the industry, this Letter of Interpretation (LI) provides interpretation of a term used in ASA-100. This definition applies only to ASA-100 and is not applicable to any other document.

INTERPRETATION:

ASA accredited companies may rely on any revision of the SPEC 300 standard released in 2000 or later (inclusive) for purposes of compliance to ASA-100.

Notwithstanding this LI, an accredited distributor is required to follow the written guidance found in its quality manual, as well as the standards to which it is accredited. If this LI contradicts the accredited distributor's quality manual, ASA-100 or AC 00-56B, then the controlling authority is determined in the following order of precedence:

1. AC 00-56B
2. ASA-100
3. Quality Manual

ANTICIPATED FUTURE ACTION:

This interpretation is offered for clarification purposes. No further action will be taken until or unless this guidance is superseded.

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