

# **C.A.S.E.**

## **AIR CARRIER SECTION**

### **POLICIES AND PROCEDURES**

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#### **C.A.S.E. 3-A STANDARD**

#### **DISTRIBUTORS OF NEW AND SURPLUS PARTS**

#### **QUALITY PROGRAM REQUIREMENTS**

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#### 1. Policy

- A. This standard describes the minimum quality program requirements for new and surplus aircraft part/material suppliers hereafter referred to as distributors. This standard is designed to aid in the surveillance of a distributor who procures new and/or surplus parts and materials and resells some or all of such products to customers in the aviation industry. This standard may be used to determine the adequacy of the distributor's quality program.
- B. Compliance with this standard does not necessarily accept a vendor for entry into the C.A.S.E. Register. Vendors that are accepted for listing in the C.A.S.E. Register must continue to meet the requirements of this standard. Vendors will acknowledge this by having an officer of the company sign the Vendor Expectations and Limitations (VEL) which is a written agreement between the vendor and the organization. Reasons for removal include, but are not limited to: safety of flight concerns, intent to defraud, ceasing operation or business, move of principal operations, or refusal of an audit from a C.A.S.E. authorized auditor performing an allocated audit to a C.A.S.E. standard. Further, a vendor shall be removed from the Register for failure to implement corrective action(s), refusal to sign the VEL prior to closure of the audit process, or failing to correct audit findings within the prescribed time limits agreed upon with the auditor. A vendor may be removed from the Register if the vendor is found to be in non-compliance with any section(s) of the C.A.S.E. standard, fails to perform work in accordance with customer instruction(s), or is in non-compliance with any of the VEL. Vendors may not publicize by statement or inference their C.A.S.E. Register status in any form (e.g. advertising, other solicitation of business) or use of the C.A.S.E. logo.
- C. Distributors are subject to a quality system audit at any time during business hours. The audit may be conducted by a C.A.S.E. member, whether or not that member is a customer of that vendor. Normally, the auditor will notify the distributor and arrange the audit so as to cause minimal interference with the distributor's operation, however, should circumstances dictate, the auditor may arrive unannounced.
- NOTE:** Register action may be taken anytime a C.A.S.E. qualified and authorized auditor/Evaluator performs an audit using this standard.
- D. An acceptable audit does not relieve the distributor of the responsibility of maintaining consistently acceptable quality system standards.
- E. A distributor audit is not interchangeable or a substitute for the audit applicable to distributors performing repair or alteration services.
- F. Quality parts and materials are necessary to support compliance with applicable CFRs as defined in Advisory Circular 20-62, which provides relevant information on aeronautical replacement parts. Suspected unapproved parts (SUPs) shall be segregated and secured and should be reported in accordance with Advisory Circular 21-29 (FAA Form 8120.11).

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G. CACS-30 is the checklist associated with this standard.

#### **2. Quality System and Quality Manual**

A. The distributor shall have an established quality system to assure a quality product that complies with customer specifications. The distributor's quality system and operations shall be described in detail in a quality manual or other appropriate document. The document shall include, but is not limited to, a detailed description of the following elements:

- 1) Quality organization
- 2) Inspection procedures
- 3) Shipping procedures
- 4) Technical data control
- 5) Record keeping
- 6) Training requirements
- 7) Shelf life control
- 8) Measuring and test equipment calibration (as applicable)
- 9) Procurement
- 10) Material control
- 11) Housing and facilities
- 12) Internal audit and surveillance
- 13) Scrapped parts procedure
- 14) Certification forms

B. Quality elements not applicable to a specific organization shall be included in the distributor's quality manual as "not applicable." This ensures the quality element was not overlooked.

#### **3. Quality Organization**

A. The distributor's organization shall be depicted in an organizational chart showing the relationship of the quality department to the rest of the organization.

B. Personnel who are responsible for quality systems must be identified by title.

C. The quality manual or document shall be kept current, identifying the standards to which it was written, and shall be readily available to employees and to the customer's auditor or designee.

D. The distributor shall maintain a current roster of personnel authorized to perform specific inspection functions and identify the inspections each person is authorized to perform.

E. The distributor of new aircraft parts shall maintain a current list of those manufacturers that have officially authorized it as a distributor.

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#### 4. Inspection Procedures

- A. Inspectors shall verify that incoming parts and materials are free of defects and are in a good state of preservation.
- B. The new parts distributor shall maintain an inspection program, which includes periodic verification that standard parts meet technical specifications applicable to the part number. The distributor shall ensure that adequate specifications are available to support the inspection process, and that these specifications are current. The distributor shall maintain a record of inspections and tests used to make this verification. Suggested programs include sample tests of physical and chemical properties and checks of manufacturer's test reports.
- C. A receiving inspection program shall be in place to verify that materials received are of appropriate quality and are from the same lot or batch number as indicated on accompanying certifications and test reports, as applicable.
- D. Receiving inspection for aircraft fasteners and raw stock shall include a visual check for general workmanship and the presence of certifications and test reports.
- E. If inspection stamps are used, a procedure must be in place to control stamp usage and replacement. The procedure must include the following:
  - 1) A facsimile of each stamp
  - 2) A means of identifying to whom stamps have been issued
  - 3) A policy for stamps that are lost or stolen
  - 4) A requirement that stamps are retired for a period of not less than six (6) months after an inspector ceases performing inspection functions.

#### 5. Shipping Procedures

- A. The distributor's quality system shall require components and parts be shipped in an ATA-300 specification container or equivalent as appropriate for the unit being shipped, or as specified by the customer. The item should be packed in the container in a manner that will preclude damage to parts or components due to rough handling of the container.
- B. Appropriately trained personnel shall conduct a complete visual inspection of all items being shipped. Inspection shall include, but not limited to:
  - 1) Checking for any obvious physical damage
  - 2) Verifying that all appropriate plugs and caps are installed

**WARNING:** Tape shall not be used to cover electrical connections or fluid fittings/openings. Adhesive residue can insulate electrical connections and contaminate hydraulic or fuel units.

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- 3) Verifying that the quantity, part numbers (including dash numbers and letters), model numbers, serial numbers, etc., of the items being shipped match the accompanying documentation and the customer's request/purchase order.
- 4) Verify the packing slips contain all information required by the customer.
- 5) Verifying the shipping container and packing are appropriate for the items being shipped.
- 6) Verifying that all appropriate and required documentation (airworthiness approval, material certification, traceability documents, etc.) are at hand, properly completed and signed.
- 7) Verifying materials classified as HAZMAT have been inspected by appropriately trained personnel.

#### **6. Technical Data Control**

- A. Any Technical data shall be maintained in a manner that ensures such data is current and accessible as appropriate. The technical data shall be stored in a manner that will protect it from dirt and damage. Hand entries in, or hand corrections to, technical data are not acceptable.
- B. A distributor's system shall request verification of AD status at time of maintenance and provide the status of all airworthiness directives applicable at the time of maintenance performed. Material certificate must indicate if AD status is unknown.

**NOTE:** An air carrier's or repair station's purchase order should identify applicable ADs and request AD verification.

- C. Where technical data is on microfilm, microfiche, or an electronic device, an appropriate viewing device must be maintained in good working order, protected from damage and available to persons using the data.

#### **7. Record Keeping**

- A. A new parts distributor shall have in place a system governing the storage, distribution, and retrieval of documents confirming that the physical and chemical properties of fasteners and raw stock aircraft materials (materials that are installed on and become part of the aircraft) are in conformance with applicable technical specifications.
- B. Records confirming aircraft fastener integrity, including physical and chemical test reports, shall be retained for a minimum of two (2) years after the sale.
- C. Records for materials with flammability requirements shall be retained for a minimum of two (2) years after the sale. Such records shall verify conformance to applicable flammability requirements.
- D. The distributor shall maintain traceability documentation and all certifications for a minimum of two (2) years from the time of sale to the customer.

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- E. The distributor must have documented in its quality manual a system that demonstrates the ability to trace parts to the source of production, or to an FAA/NAA certificate holder. Additionally, the distributor must be able to provide, upon request, information pertaining to the approval status of each part in accordance with section 21.303 of the Code of Federal Regulations.
- F. All life-limited parts shall have records from the previous operator confirming their life-limited status.
- G. Records shall be protected against damage, alteration, deterioration, and loss.
- H. The distributor shall provide a document from a FAA/NAA certificate holder or air carrier for each serviceable part indicating that the part is serviceable (not applicable to new parts unless work or test was performed on the part). The document must contain an airworthiness approval for return-to-service signed by an authorized employee. Inspection stamps, symbols or printed/stamped names are not acceptable. The airworthiness approval document shall be physically attached to the unit. This includes the part number and serial number (as applicable) of the affected item.

**NOTE:** Refer to FAA Order 8130.21; 14 CFR 43.13, Appendix B; and FAA Advisory Circular 145.3, Appendix 1 for examples of an airworthiness release statement for air carrier work.

- I. The distributor shall provide the original maintenance records received with the serviced component. These records shall list technical data used, and functional tests performed, as appropriate and as required by the customer. A list of significant parts replaced shall be included, which may be on the teardown report or on the repair station's invoice.
- J. Parts from an aircraft or engine subjected to extreme stress or heat (e.g. major fire or submersion in saltwater) must be identified as coming from such an aircraft or engine.

#### 8. Training

- A. Personnel shall be properly trained and competent to perform inspections, parts handling, and record-keeping procedures required by the quality system. This applies to personnel performing supervisory, or receiving and shipping inspector functions.
- B. Inspection personnel must be properly trained and authorized. Such persons must be knowledgeable of inspection techniques, methods, and equipment used to determine quality. Authorization criteria shall be identified in the distributor's manual.
- C. Shipping personnel shall be trained and competent in the recognition, packaging, identification, and proper handling of HAZMAT.

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- D. All training, both classroom and on-the-job (OJT) shall be documented and the records maintained for a minimum of two (2) years after the employee leaves the company.
- E. Training records shall include:
  - 1) A description of the training.
  - 2) Date and number of hours of instruction.
  - 3) Name of instructor and student and/or signature of both.
  - 4) Name of the organization conducting the training if performed by an outside agency.

#### **9. Shelf Life Control**

- A. The distributor shall document and maintain a program to assure the identification and proper handling of shelf life-limited items.
- B. This program shall include component assemblies containing shelf life-limited items.

#### **10. Measuring and Test Equipment**

- A. Test equipment, measuring devices and gages used to verify conformance to applicable standards or specifications, shall be calibrated periodically to maintain accuracy per the National Institute of Standards and Technology (NIST), or other government or OEM standards.
- B. The distributor shall have procedures to prevent tools/equipment, which are past due calibration from being used.
- C. Current documentation of calibration status shall be maintained.

#### **11. Procurement**

- A. The distributor shall maintain a procurement system such that approved quality materials are purchased, and proprietary and licensing rights are observed.
- B. The distributor shall have a system in place to assure that special requirements are adequately communicated to the distributor's sources.
- C. Distributors of new aircraft parts shall purchase materials directly from approved manufacturers, or from distributors authorized by the manufacturer to sell the product. Deviations from this policy must be disclosed to and approved by the customer prior to part shipment.
- D. Distributors shall maintain a list of their approved suppliers and a quality history of each source.

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#### 12. Material Control

- A. Material shall be handled in an appropriate manner and shall be protected from damage and deterioration.
- B. Special packaging shall be maintained as necessary. The storage area for aircraft parts should be periodically checked for overall effectiveness of storage and identification methods.
- C. A closed loop system shall exist to implement corrective action following the detection of substandard or otherwise nonconforming parts. Rejected materials must be identified as such and segregated from usable stock. The system shall include a method to notify purchasers within 24 hours of any part that exited the distributor's quality system that does not conform. Distributors shall provide a method to recall or rectify the problem. Unapproved parts should be reported in accordance with FAA Advisory Circular 21-29.
- D. Aircraft parts, and parts that may be reasonably assumed to be sold for aircraft use, shall be segregated from non-aircraft parts.
- E. Batch segregation shall be maintained for aircraft fasteners. Additionally, the distributor must maintain records indicating the quantities sold from each batch to each buyer. Purchases, less sales, should equal inventory that must balance batch/lot numbered inventories.
- F. Batch segregation shall be maintained for materials requiring flammability testing, and for other items for which segregation is appropriate.
- G. Whenever practical, materials shall be sorted and delivered in the manufacturer's original packaging. Packaging shall identify the manufacturer, distributor, part number, lot or batch number (if applicable), and the quantity.
- H. Flammable, toxic, or volatile materials shall be stored in a safe manner per manufacturer's recommendations or as specified by local fire regulations.
- I. Material subject to damage from electrostatic discharge shall be packaged, handled, and protected with necessary precaution, and in accordance with requirements for handling electrostatic sensitive devices.
- J. The distributor shall ensure that no part number ambiguity exists. Parts shall not be labeled with multiple part numbers if such labeling may cause confusion as to the part's manufacture or applicable specification.
- K. A distributor's alteration to, or replacement of, the data plate or manufacturer's part number is unacceptable.
- L. The distributor shall have a system to segregate and identify serviceable from unserviceable units in a manner that will preclude inadvertently issuing an unserviceable part.



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#### **13. Housing and Facilities**

- A. Appropriate facilities shall be maintained so as to ensure that storage does not damage inventory.
- B. If the distributor engages in aircraft component maintenance as well as parts sales, the storage area must be secured to prevent cannibalizing by maintenance personnel.

#### **14. Internal Audit and Surveillance**

- A. Audits shall be performed in accordance with written procedures or checklists that determine the effectiveness of the quality program. Audit results shall be documented including corrective action of non-compliance. Corrective action shall:
  - 1) Be appropriate and prompt
  - 2) Correct the discrepancies reported
  - 3) Locate and correct similar discrepancies, if they exist, in areas not audited
  - 4) Correct the root cause of the problem evidenced by the discrepancies
  - 5) Implement follow-up action(s) to eliminate reoccurrence.

#### **15. Scrapped Parts Procedure**

- A. There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, cutting, or other appropriate means. Parts shall be mutilated to the extent necessary to preclude the possibility of being restored and returned to service.
- B. The distributor shall maintain a record of all life-limited parts scrapped out. The record shall contain a description of the part, its part number, serial number (if applicable), and the date the part was scrapped. The distributor shall retain this record for a minimum of two (2) years.
- C. The procedure shall identify, by position or title, the individual responsible for verifying that parts were adequately mutilated before being discarded.
- D. The distributor shall impose these requirements on their subcontractors and/or repair facilities with which they do business.

#### **16. Certification Forms**

- A. The quality manual shall contain instructions for, and samples of, forms used by the distributor to certify or show traceability of each product distributed.
- B. If practical, the instructions for completing the forms may be written on the forms.

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