Manufacturing Distributors Distributors Maintenance Operations Distributors

The Update Report

The Airline Suppliers Association

Volume 8, Issue 1 January 2000

COMMERCE

Using the ATA 106 for Commercial Trace

ASA members have asked questions about the ATA Spec 106 form, like what to do with different versions of the form. This article provides answers to some of the most commonly-asked questions.

What is Spec 106?

The Air Transport Association publishes their Specification 106: Sources and Approved Parts Qualification Guidelines. This document is commonly known by its short-hand name Spec 106. Spec 106 provides air carriers with recommendations and guidance concerning quality programs, particularly in the parts receiving and procurement areas. Except to the extent that the provisions of Spec 106 may be drawn from the regulations, Spec 106 is not a mandatory document. ATA encourages its members to make their own decision about which aspects of Spec 106 should be used in each air carrier's own operations. Air carriers and other parties may freely adopt all, part, or none of the program for their own use.

Spec 106 provides a sample form for part or material commercial certification. Like the rest of the ATA specification, the form is meant to serve as a tool that is available to the industry, and its use is entirely up to the individual companies. For this reason, it is not uncommon to see many different versions of this form.

The differences in the form provide advantages and disadvantages. One advantage is that each air carrier may tailor the form to suit the air carriers own particular needs.

One of the disadvantages to different versions of the form is the lack of uniformity makes it difficult to complete the form in a uniform manner. While there are directions for the completion of the form included in the specification, these directions only apply to the form when it has not been altered.

There are human factors advantages to the use of uniform documentation for identifying parts. Personnel can be trained to look in the right place on the form for the information that is necessary. They are less likely to make mistakes in reading the form if the form is uniform.

Obviously, a variety of minor variations in the forms will increase the likelihood of misreading or misinterpreting the form. Receiving inspectors must look very carefully at the form to ascertain its actual language and interpret that language. Because the form can vary, no receiving inspector can rely on the form to attest to any uniform information until the complete form has been studied. This eliminates the human-factors advantages to form harmonization.

(Continued on page 11)

Inside this Issue:

Congratulations to:

Topcast Aviation Suppliers Co.
Kwai Chung, Hong Kong

for their accreditation to the Airline Suppliers Association's Accreditation Program, and

Aviation Material Management, Inc.
Ogden, UT

Celsius Amtec
Miami, FL

Flight Director, Inc.
Austin, TX

Western Aero Services, Inc.
Aurora, CO

For their re-accreditation to the Airline Suppliers Association's Accreditation Program

ASA AIRLINE SUPPLIERS ASSOCIATION

Commercial Requirements Are Important, Too

(Continued from page 1)

Block 13

The form described in Spec 106 features standard information blocks. Some particularly important information can often be found in the remarks area of the form. The remarks area is split into three sections: Block 13A (remarks), Block 13B (obtained from) and block 13C (last certificated agency).

Directions for the use of the Spec 106 form are found in Appendix C to the specification. The directions make it clear that block 13B is meant to represent "seller's source of purchase." If the seller is an FAA certificate holder, then the directions for this block state that completing it is optional.

Block 13C is meant to be used for parts that have been subject to some form of maintenance work.

According to Spec 106, Block 13C is meant to identify the last certificated agency that performed maintenance on the component. In some cases this may be the last operator. For example if the last air carrier to use the part performed an inspection on it (such as the inspection described in FAA Order 8130.21B), and found it to be airworthy, then the carrier would be the last certificated agency to perform maintenance. Remember: inspection is a maintenance activity!

Block 13C is <u>not</u> meant to represent the last certificated agency to <u>own</u> the part. An overhaul part could be purchased by an air carrier, remain for six months in the inventory of that air carrier, and then be sold without the air carrier ever performing maintenance on that part. In such a case, the last certificated agency would not be the air carrier, but would instead be whatever company last performed a maintenance activity on the part.

Common Alterations

The SPEC 106 form is a commercial form recommended by ATA. As such, it is not binding and air carriers and other parties frequently develop their own versions of the form that diverge from the ATA recommendation. For this reason, it is not uncommon to see alternative language in block 13B or in Block 13C.

One popular modification to the ATA 106 form is the replacement of the Block 13B descriptive text with a phrase like "traceable to."

“Traceable to” is not the ATA-recommended language for the form, so the Spec 106 instructions do not provide clear guidance about what this language means. Many people interpret this sort of language to mean the last certificate holder that owned the part, but some interpret it to mean traceability to the FAA-approved manufacturer who produced the part.

The ATA 106 is a tool to facilitate commerce. As such, you should use it to reflect the information that you and your customer need to exchange. Anyone who completes a Spec 106 form should make sure that the information conveyed accurately reflects the truth, and also effectively communicates the information that is important to both parties.

Look carefully at the language of a Spec 106 form provided by a business partner, because it may not use the common language, and when it does not, it is important to understand what the alternative language means.

Where the parties intend to use any Spec 106 block to reflect information other than that described in the instructions, then it should be clear on the face of the form what information is actually provided. Bear in mind, though, that the ATA rules for completion of the form would likely apply in any dispute resolution, unless the form had been materially altered so as to make the ATA 106 rules meaningless, or you had a written agreement concerning the alternative method for completing or interpreting the form. If the text on the form is not clear, then an explanatory paragraph attached to the form may be in order, to avoid later confusion.

Value of the ATA 106 Form

The ATA Form 106 is an uncontrolled document that may be the subject of ad hoc revision by individual users. Different versions of the form can mean different things based on revisions to the text on the form. It is not supported by the FAA regulations. It can be signed by companies that do not hold an FAA certificate. In light of these facts, some people ask whether the ATA 106 form continues to have value in the modern age. The short answer is, “Yes. “

It is common to forget that documents do not have to be considered “regulatory” in nature to be valuable. Commercial documents reflect information that is important to commercial transactions, and often this information can be important to the analysis performed by a mechanic at the time of installation. A properly completed Spec 106 form provides a variety of information, such as commercial traceability that helps the end use know who to contact in the event of problems with the part.

Use the ATA 106 Form wisely to reflect the information that you and your customer need to exchange.