

DOCUMENT REVIEW LOG

1. Document No.: Draft AC 21-29D	2. Project Manager: AIR-112,	3. Reviewing Office: Consolidated Field Comments	4. Date of Review: Various	5. Date of AIR-100 Disposition: July 31, 2015
--	--	--	--------------------------------------	---

Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by AIR-100 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

Block 5: To be completed by AIR-100 PM, after receiving comments from field offices. Enter date of disposition.

The below columns are to be completed by the Field Offices, except for the "AIR-100 Disposition" column.

AIR-100 PMs disposition comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as one of the following:

- Adopted
- Partially Adopted
- Non-Concur
- Concur but Outside of Scope (Will be considered in next change/revision)
- Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
----------	------------------------	----------	---------	-----------------	----------------------

ANE-MIDO-41

1.	Page 4 Para 6.2.1	Paragraph 6.2.1 for sending the complete FAA Form 8120-11 states "Send the completed form to the FAA Hotline Office via 3-mail or mail it to the address listed below: Federal Aviation Administration Office of Audit and Evaluation 800 Independence Avenue, SW Washington, DC 20591	The email address is not listed in the paragraph, but it is listed in Appendix A-2 for instructions on completing the form.	Recommend adding the email address to para 6.2.1.	Adopted.
2.	Page 5 Para 8.1.2	Paragraph 8.1.2 references FAA Order 8120.2, Production Approval and Certificate Management Procedures	Para 8.1.2. of this AC is referencing an outdated order	Para 8.1.2. of this AC should be changed to reference 8120.22 and 8120.23	Adopted.

ANE-MIDO-42

3.	Page 5, paragraph 8.1.2	Refers to outdated order 8120.2.	Outdated reference	Recommend referring to current orders 8120.22 and 8120.23	Adopted.
----	----------------------------	----------------------------------	--------------------	---	----------

ANE-MIDO-44

No Comments Received

None.

ANE-MIDO-45

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
4.	5.1	<p>Starts with: “Establish a procedure to ensure the procurement of approved parts prior to purchasing parts and material for installation in type certificated (TC) products.”</p> <p>Q: Who is responsible for “establishing a procedure”? The installer, the repair stations, the PAH?</p>	Responsibility not defined.	Suggest defining who/organizations with this responsibility.	<p>Non-Concur:</p> <p>A proper reading of the second half of first sentence indicates that those entities that procure parts and material for installation in TC products are the intended audience for the “Procurement Process” section.</p> <p>Additionally, para 2, “Audience” indicates “... all personnel involved in producing, selling, and distributing aircraft parts and to all aircraft maintainers who remove, repair, overhaul, and install aircraft parts.”</p> <p>The intended audience is clear.</p>
5.	5.2.5.4	Spelling error “Pars”	Typo/Spelling	Replace with “Parts”	Adopted.
6.	6.2.1	<p>Suggest adding email address to paragraph 6.2.1:</p> <p>6.2.1 Send the completed form to the FAA Hotline Office via e-mail <u>9-AWA-AVS-AAI-SafetyHotline@faa.gov</u> or mail it to the address listed below:</p>	Make it easier to email if email address is shown and maybe linkable.	Add email address to paragraph 6.2.1	Adopted.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
7.	6.2.1	<p>Address in AC 21-29D is: Federal Aviation Administration Office of Audit and Evaluation 800 Independence Avenue, SW Washington, DC 20591 Attn: AAE-300, Room 911</p> <p>Address on Form 8120-11 (11/05/2010) address is: Federal Aviation Administration Office of Audit and Evaluation, Aviation Safety Hotline, Rm 911 800 Independence Avenue, SW Washington, DC 20591</p>	Minor difference in addresses.	Ensure that the differences are not an issue in routing mail.	Adopted.
8.	7.1.1 thru 7.1.6	Are the paragraph numbers really necessary?	It adds clutter to list.	Suggest numbering 7.1 only the rest just a bullet listing.	<p>Answer to Question:</p> <p>Concur with comment, but unfortunately this is necessary pursuant to newly revised FAA Order 1320.46D, released in April 2015. The order directs that AC revisions will incorporate the new paragraph decimal numbering system.</p>
9.	8.1.1 thru 8.1.8	Are the paragraph numbers really necessary?	It adds clutter to list.	Suggest numbering 8.1 only the rest just a bullet listing.	<p>Answer to Question:</p> <p>See previous answer above.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
10.	Paragraph 9	Should be moved to paragraph 5. Then re-paragraph number 6 thru 9.	Background of the program should come before procedures or make it an Appendix.	Move to paragraph 5. Then re-paragraph number 6 thru 9 or make paragraph 5 Background in an Appendix.	<p>Non-Concur:</p> <p>Paragraph 9 is properly placed in the rear of the AC in the "Background" section as directed by FAA order 1320.46D, April 2015. This para addresses past events (background) and also refers to the SUP order for program responsibilities and operations. Para 9 is ancillary to the AC but not procedural, thus it is inappropriate to place that information in section 5, "Procurement Process" which conveys steps to follow to prevent acceptance of unapproved parts.</p> <p>It is inappropriate to place paragraph 5 in the Background section. Para 5 is one of the key sections (along with para6) conveying important procedural information to the audience.</p>

ANE-140

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
11.	Page 1; Para 4 CHANGES	AC Rev D. states that the organization responsible for SUPS program has changed from AVS to AIR; however, Order 8120.16 still defines AFS and AIR as jointly responsible (AFS for “used” parts, AIR for “new” parts).	Regardless of whether AFS or AIR, the SUPS Order predominantly refers to inspector functions. These inspectors’ organizations, not ACO’s, have the reach to determine the identity, quantity and location of parts. Also, the ASI’s, not ACO’s, widely employ surveillance, investigation, and enforcement actions. ACO’s are primarily equipped to determine the type design, and the part criticality (i.e., if an unsafe condition results).	Clarify that when AIR is invoked, that refers to the Manufacturing Inspection Offices specifically, not ACO’s.	<p>Adopted:</p> <p>FAA Order 8120.16 is under revision concurrently with AC21-29 and the appropriate changes have been made to the order to reflect this information. The SUP order will be published prior to the AC.</p> <p>This comment’s “Reason” and “Recommendation” blocks are appropriate to consider for the SUP order 8120.16A revision and will be directed to that document revision process for consideration. It is the perception of the AIR SUP Focal Point that the ACOs are available for consultation and guidance but not to be tasked with investigations or SUP reports. The order revision will be reviewed for clarification of that concept.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
12.	Page 5; Para 9 Background	AC Rev D. omits information (see Paragraph 6.a.(5) of AC 21-29C) regarding the owner/operator's obligation to determine airworthiness of a part.	This is a key point that should be retained, esp. given the "accountability framework" emphasis.	Include information from AC Rev C Paragraph 6.a.(5) stating that it's the owner/operator's obligation to determine airworthiness of a part.	<p>Non-Concur:</p> <p>91.403(a) says; "The owner or operator of an aircraft is primarily responsible for maintaining that aircraft in an airworthy condition ..."</p> <p>Commenter has extrapolated the meaning of the regulation to say that the owner/operator must determine airworthiness of a part. In the case of a part 121 operator, <u>121.363</u> says each certificate holder is primarily responsible for – (1) The airworthiness of its aircraft, including airframes, aircraft engines, propellers, appliances, and parts thereof, and part <u>135.413</u> uses almost the same exact words to determine that responsibility.</p> <p>However, other owner operators, not performing their own maintenance (mostly GA aviation) using a part 145 repair station, the situation is different. In those cases, 145.211(a) says "A certificated repair station must establish and maintain a quality control system acceptable to the FAA that ensures the airworthiness of the articles on which the repair station or any of its contractors performs maintenance, preventive maintenance, or alterations." So the repair station is responsible to ensure airworthiness of the articles.</p> <p>Part 91 is cited in paragraph 7, Related Regulations, and the reader can peruse that and part 145, Repair Stations at their leisure.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
13.	Page 5; Para 9 Background	What's left in the AC Rev D seems essentially unchanged from what was in the old AC, but AC Rev D deleted discussion info that was deemed useful before	I agree that much of AC Rev C Chapter 5. Background is irrelevant (i.e., history of the SUPs program, etc.). However, the regulatory background is still useful and relevant.	Include the information from AC Rev C Section 6.a. (Discussion; Outline of Regulations).	Non-Concur: It was decided early in the revision process that AC 21-29 Rev C Section 6.a. "Outline of Regulations" was superfluous. The section was deemed to be a simplistic rendition of the regulations that offered no added value to the AC and that paragraphs 7., "Related Regulations" and 8. Related Reading Material" offered the pertinent references sufficient to point the reader to the proper resources for more information and guidance.

ANM-100S

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	None	The AC and Order 8120.16 don't align.	Public point of contact and primary responsibility don't align between Order and AC possibly causing confusion and delay. There are other inconsistencies. FAA is constrained to follow Order not AC, therefore ...	Delay issuance of AC until review and change of Order 8120.16 occurs.	Non-Concur: FAA order 1820.16A is currently in revision and will be published prior to the AC 21-29D revision. The order has incorporated all relevant changes to align with the AC
2.	Pg. 1 Purpose	Capitalize Advisory Circular and Suspected Unapproved Parts	Both identified as acronyms		Non-Concur: The recommendation conflicts with guidance from AIR-500 review on capitalization.
3.	Pg 1 ¶1	The AC doesn't provide updated information. The purpose of the AC is unchanged.	Not all information is updated from 29C.	Delete the word "updated" – "...provides updated information ..."	Concur: Removed.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
4.	Page 1 Paragraph 5	The third sentence could use rewording for clarity. "The following guidelines offer a means to use in your facility's <i>receiving section</i> to..."	Addition of the word "inspection between "receiving" and "section would be a more appropriate choice of words. Manufacturers often have a receiving department and a receiving inspection area but the two functions are typically separate. Listing the receiving "inspection" function would ensure that the parts are being inspected and not just received.	Add the word "inspection" to the sentence.	Non-Concur: The recommendation is overly specific. This is a generic reference to apply to manufacturers, repair stations, and even other suppliers, when receiving parts, not just manufacturers. The reference is intended to be general so as to apply to various organizations that receive parts
5.	Pg. 2 Para 5.1	Capitalize Type Certificated	Identified as an acronym		Non-concur: Conflicts with guidance from AIR-500 on using capitalization.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
6.	Page 2 Paragraph 5.1	The wording "Procurement Process" is not contained in any applicable CFR sections or FAA policy. Change the title to "Supplier Control Process" to meet the wording in 14 CFR part 21 and FAA policy.	The wording of 14 CFR part 21 requires the production approval holder (PAH) to have a quality system that includes "supplier control" but there is no requirement for a "procurement process." This wording may confuse PAHs.	Change the title to "Supplier Control Process."	<p>Non-Concur:</p> <p>The definition of "process" is; "A series of actions or steps taken in order to achieve a particular end." The brief guidance in the AC under "Procurement Process" is included to prescribe a simple set of steps that a repair station, manufacturer, or supplier may voluntarily use to help identify a possible SUP when receiving parts. Additionally, this AC does not define how to comply with an FAA regulation. If it did, the comment would be on point and would be adopted. However, there is no regulatory basis for the SUP program and the SUP policy rests solely on the FAA order that established the program in 1995.</p> <p>Finally, the supplier control process as described in AC 21-43 <i>Production Under 14 CFR Part 21, Subparts F, G, K, and O, paragraph 3-3</i>,(referenced in para 5.3 and para 8.1.3 of the SUP AC) is a detailed and comprehensive process that is mandatory for PAH's. That is not what the SUP AC is referencing. Companies that hold a PAH are, or should be, aware of their responsibilities for supplier control so further explanation is not appropriate for the SUP AC. Since the SUP AC is not restricted to PAH's, the simple guidelines offered are appropriate for the sole purpose, which is to assist all facilities in detecting SUPs.</p>
7.	Pg. 3 Para 5.2.5.4	Typo: "Pars Manufacturer Approval",	Typo	Change to Parts Manufacturer Approval (Chris baker)	Adopted.
8.	Page 3 Paragraph 5.2.5.4	"FAA Pars Manufacturer..." is misspelled.	Typographical error.	Correct to read "FAA Parts Manufacturer..."	Adopted (same as #7.)

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
9.	Page 3 Paragraph 5.2 T.B.D. (at the end below 5.2.8?)	<p>We should include a note regarding clarification of “part” and “raw material” in this AC similar to AC 43-18 CHG2 paragraph 3.k. which states: “NOTE: The definition of a part for the purposes of this AC would not include raw materials or repair segments being utilized for the repair or alteration of a part. (i.e., sheet metal stock, sealants, lubricants, raw forgings, or castings, billet material, etc.”</p> <p>NOTE: AC 43-18, <i>Fabrication of Aircraft Parts by Maintenance Personnel</i>, is listed in this Draft AC in paragraph 8.1.8 under Related Reading Material.</p>	<p>We should be in alignment with other Advisory Circulars issued by the FAA. AC 43-18 CHG2 paragraph 3.k. defines a part as: “Part. For the purposes of this AC, is an article that could be produced under the provisions of 14 CFR part 21 and is eligible for installation on a certificated aircraft without further manufacturing processes.” The associated note for this paragraph states: “NOTE: The definition of a part for the purposes of this AC would not include raw materials or repair segments being utilized for the repair or alteration of a part. (i.e., sheet metal stock, sealants, lubricants, raw forgings, or castings, billet material, etc.”</p>	<p>Add a note at the end of 5.2 that states: “NOTE: The definition of a part for the purposes of this AC would not include raw materials or repair segments being utilized for the <i>manufacture</i> of a part. (i.e., sheet metal stock, sealants, lubricants, raw forgings, or castings, billet material, etc.”</p> <p>The only change from the AC 43-18 needed would be the substitution of “repair or alteration” with “manufacture” for this AC.</p>	<p>Adopted:</p> <p>Add;</p> <p>“Note: For purposes of this order, the term “part” does not include raw materials, (i.e., sheet metal stock, sealants, lubricants, raw forgings, casting, or billet material, etc.)”</p> <p>Note: added in 2 places in the AC,</p> <ol style="list-style-type: none"> 1. After para 5.3.8 2. After para B.1.12.4
10.	Page 3 Paragraph 5.2.8	<p>There is an action missing from this sentence. Add “... through your supplier prior to initiating a SUP report...”</p>	<p>The paragraph seems to imply that the PAH should attempt to resolve issues, but the required action is not identified. The issue may be that a document indicating FAA approval of the part was accidentally omitted from the paperwork. Submitting a SUP report when a simple email or phone call could have resolved the issue misdirects limited FAA resources.</p>	<p>Change the wording to “Segregate suspect parts and attempt to resolve any issues regarding the part’s questionable status <i>through your supplier prior to initiating a SUP report...</i>”</p>	<p>Adopted:</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
11.	Pg 3, ¶5.3	It is unclear what the expectation is considering this. 14CFR 21.137/307 is known Production Approval Holders (PAH) and a required part of the PAH's quality system.	The paragraph is redundant and should be removed. However if the expectation is that sellers, distributors and maintainers implement supplier evaluations, then the paragraph should state this recommendation.	Delete the paragraph unless it is the intent for others to implement this requirement. If so make this clear.	Non-Concur: (IOU) Keeping the paragraph, but will research the issue for better language to indicate that Repair Stations are not required to establish a Supplier Evaluation system, but that they can do so as an option.
12.	Pg 4, ¶5.4	The paragraph is just information – good information. And is within the overall paragraph regarding detection of SUPs. However, what should be done with the AC?	The added sentence tells the reader they should review the AC 20-62 and incorporate it as part of their process to detect SUPs.	Add this after the first paragraph in 5.4 – “AC 20-62 should be reviewed and pertinent information made part of the procurement processes discussed sections 5.1 and 5.2 above.”	Non-Concur: It was decided early in the revision process that AC 21-29 Rev C Section 6.a. “Outline of Regulations” was superfluous. The section is a repeat of the regulations that offered no added value to the AC. Paras 7., “Related Regulations” and 8. Related Reading Material” offering the pertinent Regulations and ACs were sufficient to point the reader to the proper resources for more information and guidance.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
13.	Pg 4 ¶5.4 (2 places); pg B-2 ¶B.1.6 (2 places)	The use of “TC product” should only be “product.” Further Order 8120.16 only uses “product” as do the instructions for Form 8120.11 (Order and AC).	The word “product” is used alone in seven other places. By definition of 14 CFR part 21.11 type certificates (TC) are only issued to products (aircraft, aircraft engines, propellers).	Change “TC product” to “product” for consistency.	<p>Non-Concur.</p> <p>Commenter is correct in that some uses of the term “product” stands alone. However, the use of the phrase “type certificated product” is not without example. The most common format is the first instance of use is the full phrase, and then to use “product” thereafter, but not universally.</p> <p>For 14 CFR part 21 paragraphs that use the phrase “type certificated product”: See 21.8(c); 21.9(a); 21.9(b); 21.29(b); 21.45(c); 21.101(b)(1),</p> <p>For ACs, see FAA AC 20-62 para’s 1.; 4.b.; 4.g.(Note); 4.k.; 6.; 7.b.; 7.b.(3); 7.d.; 8.d.(5); 8.e.; 8.j.; and 12.a.;</p> <p>Also FAA AC 43-18, para’s 3.b.; 5.a.; 6.d.(2)(h)1.</p> <p>Other examples exist. The use of the phrase “TC product” is appropriate if the writer wants to ensure that the reader understands the criteria described specifically pertains to that qualification.</p>
14.	Page 4 Paragraph 6	Change the first word in the sentence from “Reports” to “Discovery”	Clarity. “Reports of a SUP...” may indicate a written document. “Discovery of a SUP...” is that act of finding a SUP.	Change the first word in the sentence from “Reports” to “Discovery”	See next item for response

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
15.	Pg 4, ¶6	The tone seems directed to FAA and not the audience.	Improves clarity and provides direction of what the section is about.	Change to: “ Reports of a Discovery of SUP may originate from numerous sources such as incoming/receiving inspections, audits, facility surveillance, complaints, congressional inquiries, accident or incident investigations, or various service difficulty reports. These should be reported to the FAA as discussed below.”	Partially adopted; Changed to... “SUP reports may originate from numerous sources such as.....”
16.	Pg 4, ¶6.1	Clarity and direct plain English.	The tone is to a supervisor “requesting” something of another person. By clearly stating the submission of a name ENABLES the FAA is much more specific.	Change to “Although reports ... request the - submission of the reporter’s name to enables the FAA to ...”	Adopted
17.	Pg 4, ¶6.2.1	The instruction is to send the report by email or postal mail. However, only the postal mailing address is provided.	They need an e-mail to follow the direction.	Insert e-mail address for reporting.	Adopted
18.	Pg 5, ¶8.1	The following Orders are also relevant particularly regarding direct ship authority.	See Item 27.	Add Orders 8120.21 and 8120.23.	Partially Adopted. FAA order 8120.21 <i>Certificate Management of Production Approval Holders</i> , was issued in Sept 2012 and rescinded by AIR-1 memo in December 2012. FAA order 8120.23 “Certificate Management of Production Approval Holders” was issued in Feb 2013. FAA order 8120.23 will be added to par 8.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
19.	Pg. 5 Para 8.1.1	The Title of the FAA order is incorrect. It should say “ <i>Processing Reports of Suspected Unapproved Parts</i> ”	The Title for FAA Order 8120.16 is not <i>Suspected Unapproved Parts Program</i>		Non-Concur. FAA Order 8120.16 is in revision and the title has been changed. The order will be published prior to the AC 21-29D.
20.	Pg. 5 Para 8.1.2	FAA Order 8120.2 is not found on RGL.	It’s possible that this FAA Order should be <i>8120.23 Certificate Management of Production Approval Holders</i> or <i>8120.22 Production Approval Procedures</i>		Answer to Statement: Yes, 8120.2 is no longer current. The info has been incorporated into FAA order 8120.22, <i>Production Approval Procedures</i> and 8120.23 <i>Certificate Management of Production Approval Holders</i> .
21.	Pg 6, §9	Background should be provided at the beginning to put things in context for the remainder of the document.	Contest of history should be first.	Move the background section to after §4 and renumber as §5 and then renumber the following sections accordingly.	Non-Concur Commenter may not be familiar with FAA order 1320.46D, “ <i>FAA Advisory Circular System</i> ” dated April 7, 2015, which states in Chap 3, para 6.c. - “ Administrative information. Place administrative information after the main body of the document. This material may include: (1) Background information. If you must include more information on background than you explain in the main part of the AC, then include a specific paragraph on background. ” The Background section is properly placed.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
22.	Pg 7, ¶9.3	One of the definition changes was from “Aviation Safety Hotline” to “FAA Hotline” (see §6.2.1 & 6.2.2).	By adding the word “then” places the previous office title in context of background/history.	Change to: “...through the <u>then</u> Aviation Safety Hotline office ...”	<p>Non-concur.</p> <p>The sentence is written in past tense and the previous sentence specifies that the occurrence took place in 2007. It is accurate for the frame of reference. Additionally, even though the program name has changed to just the FAA Hotline Program, the FAA still maintains the “Aviation Safety Hotline” webpage at: https://www.faa.gov/contact/safety_hotline/</p> <p>So not much has changed even though FAA order 1070.1A indicates that “The Administrator’s Hotline Operations Program, Aviation Safety Hotline, and Consumer Hotline were consolidated under the Office of Audit and Evaluation (AAE). This revision reflects process changes from the consolidation.”</p>
23.	Pg A-2, Table below item 8	One of the major updates was the removal of approved production inspection system as a type of production approval holder.	Consistency and currency.	Change to: “following four three types of FAA production approvals: production certificate, approved production inspection system , parts manufacturer ...”	Adopted
24.	Pg B-1, ¶B.1	What does “notwithstanding” mean? It could mean the definitions within the AC take precedence over the definitions within the regulations. The word is unclear and slang.	Slang and lacks clarity.	Change to: “The definitions of 14 CFR parts 1 and 21 supersede those of this AC if conflicts exist. The definitions below apply to terms within this AC and provide context of terms from parts 1 and 21 used within this AC.”	<p>Partially Adopted:</p> <p>Concur with comment and reason.</p> <p>Non-concur with recommendation as written.</p> <p>Sentence Changed: “The following definitions apply exclusively to terms used in this AC:”</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
25.	Page B-2 Paragraph B.1.5	Wording (caller) is not consistent with other definitions in the AC and is confusing. Recommend changing to: "The reporter's identity may be kept confidential, if requested."	Clarity/consistency. Paragraph B.1.9 defines the person who furnishes the information regarding a SUP report as the "reporter" but this paragraph uses the word "caller" instead.	Change the last sentence to read: "The reporter's identity may be kept confidential, if requested."	Non-Concur This paragraph is specifically referring to those people that use the Hotline telephone numbers and the phone to report things that affect aviation safety. That includes other things than just SUPs and is iterated to advise the reader that reporting any infraction can invoke confidential status if requested. Referring to individuals who use a "Telephone as "callers" is not unusual or inappropriate. Comment offers no value added to the AC.
26.	Page B-2 Add a new paragraph	This AC should be in alignment with other Advisory Circulars issued by the FAA. AC 43-18 CHG2 paragraph 3.k. defines a part as: " Part . For the purposes of this AC, is an article that could be produced under the provisions of 14 CFR part 21 and is eligible for installation on a certificated aircraft without further manufacturing processes."	FAA ACs should all offer the same definitions to the public. Also clarifies that a part requires NO further manufacturing processes. This would preclude raw materials (i.e., sheet metal stock, sealants, lubricants, raw forgings, or castings, billet material, etc.)" from being confused with parts and submitted as a SUP report.	Add the definition of "Part" into Definitions on page B-2 that states: " Part . For the purposes of this AC, is an article that could be produced under the provisions of 14 CFR part 21 and is eligible for installation on a certificated aircraft without further manufacturing processes."	Non-Concur The definition for "Approved Part" cites 14 CFR 21.1, 21.8 and 21.9 plus the criteria of conforming to the type design and be in a condition for safe operation. The definition also states that a part produced to the criteria in the regulation may not be eligible for installation because it may be defective, lack required maintenance, etc. Additionally, there is no regulation that states that FAA ACs "should all offer the same definitions to the public" or that 43-18 is the FAA standard regarding the definition of "part" is concerned. No substantiation for this "opinion" found.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
27	Pg B-2, ¶B.1.6	<p>The definition for counterfeit parts isn't used with the body of the AC or the form. Therefore why is it necessary? Also the word "ineligible" is used in only one other place which is B.1.13.2. Order 8120.16 doesn't use this term either. Again the Order also uses the word "ineligible" in one place.</p>	<p>No context or use within the body of the AC, Order 8120.16 or Form 8120-11.</p>	<p>Delete the definition or provide for its context and use with the body of the AC and Order.</p>	<p>Non-Concur</p> <ol style="list-style-type: none"> 1) The term "counterfeit part" is used in the definition of "Unapproved Part" (para B.1.13) and is an important term in the SUP program. In fact, it was concern for counterfeit parts that was one of the main reasons for establishing the SUP program in 1995. Additional reading about counterfeit parts in the electronics industry (integrated circuits, transistors, capacitor etc.) and the current law enforcement efforts at intercepting these items reinforces the high level of concern in the aviation and other communities for this growing problem. Counterfeit parts is a vital and growing concern across the spectrum of equipment in the aviation and many other fields. There is no basis to accept the recommendation. 2) The word "ineligible" is used several times in the 8120.16A revision to be published prior to the AC. It is a common word and a simple concept.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
28.	Pg B-2, ¶B.1.6	The wording of the definition changed from “not eligible” to “ineligible.” In reading this I often read the word as “eligible” for installation.	Clarity and human factors.	Change “ineligible” to “unqualified” assuming definition isn’t deleted.	<p>Non-Concur.</p> <p>The term “ineligible” is a common word. The commenter assumes that the audience will misunderstand or be unable to discern its proper use. Additionally, please refer to FAA order 8900.1, Volume 6, Chapter 2, para 6-1012, Sub-para A. Approved Parts; “Improper maintenance/alteration of an approved part does not render the part unapproved, but can render the part ineligible for installation because the part was not maintained or altered in accordance with the provisions of part 43.” This reference is used in the SUP order (8120.16) for explaining improper maintenance and its inclusion in the AC (although not specifically concerned with improper maintenance) is appropriate.</p>
29	Pg B-2; ¶B.1.6	The definition uses the term “awaiting maintenance status” as a part which is unqualified for installation. Within the body of the AC the term is unused but could be inferred as a part without a “return to service” (see ¶5.2.5.2) or inferred within note 2 of ¶B.1.1, “Approved Parts” as a lack of required maintenance.	Slang, assumed training and knowledge of what “awaiting maintenance status” means.	Assuming definition for “parts not eligible” isn’t deleted a separate definition and wording within the body of the AC for the context of “awaiting maintenance status” is developed.	<p>Partially Adopted:</p> <p>Concur with comment regarding “awaiting maintenance. Changed 2nd sentence to read:</p> <p>“A part that is ineligible for installation on an FAA TC product. This definition also applies to an approved part in a repair status that has not received an approval for return to service.”</p>
30	Pg B-2, ¶B.1.7	In the same way the definition for Administrator was removed, it should be presumed this is also known from 14 CFR part 21	Clarity, consistency and avoidance of conflict should change in the future occur to parts 1 and 21.	Delete.	<p>Non-Concur.</p> <p>The term “product” is used over 20 times in the document. Definition is appropriate.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
31.	Pg B-2, ¶B.1.8	See item 17.	See item 17.	Delete.	Non-Concur Production Approval Holder is referenced 8 times in the body of the AC. There is no harm in placing the definition of the term in the AC. It will help first time readers of the AC as well.
32.	Pg B-2; ¶B.1.9.2	The last sentence is a direction to the FAA not to release the Reporter's identity. This is a direction to the FAA and outside the scope of the Audience as defined in §2.	Direction to FAA staff which should be in Order 8120.16.	Delete "... If the reporter requests confidentiality, any details relevant to the SUP report that could reveal the reporter's identity outside the agency must not be released. "	Non-Concur. This is valuable information and confirms to the public how the agency will handle their personal information. Although the same wording is used in the FAA order, that does not render it irrelevant to the AC's audience.
33.	Pg B-3, ¶B.1.10	The note isn't a definition but an instruction which should be within the body of the AC. Probably current section 5 or maybe 6.		Place note within body of AC.	Non-Concur: The note is specifically relevant to the definition of "Standard Part" in its reference to the requirement to be part of the type design, and it is placed directly below the definition. There is no better placement for the information as presented in the note than its present location. No change.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
34.	Pg B-3, ¶B.1.10	14 CFR 21.1 doesn't define "Standard Part" but does define "Commercial Part." The note states that the audience must confirm the standard part is used as part of the "approved design." It is unclear from 14CFR21, AC 20-62 and AC 21-45, ¶5 that a Standard Part must not be defined as a Commercial Part within the ICA to be included as part of the type design for a product or approval (PMA or TSOA). Without designation within the ICA or some other part of the type design it is unclear that a standard part has been approved as part of the design. AC 20-62 has no guidance regarding requirements for inclusion and identification as being part of an approved design. AC 21-45 also has no requirement or guidance regarding approval of a standard part as being "approved" within a type design.	Confusion and completeness.	Provide guidance within the body of this AC of how a standard part might be identified as part of a type design and controlled accordingly.	<p>Non-Concur:</p> <p>The commenter may have a valid point about the lack of guidance from the FAA in the area of standards parts. However, the recommendation is far outside the scope of the purpose of the AC, to help identify and report SUPs. The definition and explanation of how standard parts may be included in the design and production of products is better left to other sources such as: FAA order 8120.23, Certificate Management of Production Approval Holders, (see para 3-55 a.(6) and appendix Q) definition section.</p> <p>AND:</p> <p>FAA order 8120.22, Production Approval Procedures, para 4-1 d.(7)</p> <p>Also see: AC 20-62, para 4.f., "Standard Part" definition.</p>
35	Pg B-3, ¶B.1.12	Non-conforming parts could be defined as failing to meet "any" the requirements of 14 CFR parts 21.8 and 21.9 since they failed to meet the requirements or the type design. Traditionally these parts were considered "approved" and could only be addressed through an Airworthiness Directive since they were provided by a PAH.	So broad as to include all parts non-conforming to Part 21 but were approved as part of a production approval.	Provide a note clarifying that non-conforming parts installed by a PAH or provided as spares aren't SUP. These should be reported to the PAH for disposition through the PAH's FAA oversight office.	<p>Non-Concur</p> <p>The commenter makes a valid point, but the recommendation does not offer enough detail to follow through on a change to the AC. Additionally, this issue is actually addressed in para B.1.13.2of the AC in the definition for "Unapproved Part" and the following NOTE. The NOTE directs the SUP reporter to contact the PAH for corrective action.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
36	Page B-3 Paragraph B.1.12	Recommend changing last sentence to read: "Reasons for suspecting a part is unapproved may include, but is not limited to:	Clarity. Open up the possibilities of other reasons for suspecting an unapproved part exists.	Change last sentence to read: "Reasons for suspecting a part is unapproved may include, but is not limited to:	<p>Non-Concur:</p> <p>The sentence: "Reasons for suspecting a part may include:" is not restrictive and offers 4 examples. Also, the previous sentence is expansive in that it states "A part that for any reason, is believed to be not approved for use on a TC aircraft." There is ample direction to indicate that other conditions may exist.</p> <p>Recommendation adds no value to the paragraph as written.</p>
37	Pg B-3, ¶B.1.12.1 through .4 and note	This is a process and not definition. Further this is redundant information which is covered in §5.2. The note however isn't in section 5.2.	Not a definition and redundant.	Delete B.1.12.1 through B.112.4 move note into body of AC.	<p>Non-Concur:</p> <p>The commenter is incorrect. This entry is most definitely a definition in that it lists the conditions and characteristics that describe a SUP. The definition is concise, accurate, not simply a reiteration of the information covered in para 5.2 and provides needed guidance. It is essentially identical to the definition provided in the SUP Order 8120.16A, currently in revision. It is appropriate for inclusion in the SUP AC and the AC would suffer without its inclusion.</p>
38.	Pg B-3, ¶B.1.13	See Item 22.	See Item 22.	See Item 22.	<p>?? Unknown what is being recommended or commented on. Item 22 not related to definitions section. ??</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
39.	Page B-4 Paragraph B.1.13.X?	Recommend adding another paragraph (maybe B.1.13.7?) that states: "Surplus parts remaining (left-overs, over-runs) from a legitimate contract or purchase order from a PAH are not approved until the PAH accepts them into their FAA Approved quality system."	We have investigated numerous SUP reports for parts that were "left-overs" from legitimate contracts/purchase orders from a PAH. However, those parts were never accepted into the PAH's quality system, making these parts "unapproved" but yet were offered for sale by the supplier. Sellers often claim the parts for suppliers were manufactured "under the PAH's FAA approved system." That is not true until the parts are "accepted" into the PAH's quality system.	Add another paragraph (B.13.7) that states: "Surplus parts remaining (left-overs, over-runs) from a legitimate contract or purchase order from a PAH are not approved until the PAH accepts them into their FAA approved quality system."	<p>Adopted:</p> <p>Added B.1.13.7</p> <p>"Surplus parts (left-overs or over-runs) produced by a company not possessing a PMA or direct ship authority, that were manufactured to satisfy a contract or purchase order with a PAH, and were never accepted into the PAH approved quality system."</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
40.	Page B-4 Paragraph B.1.13.1	This paragraph states: "Parts shipped directly to the end user by a manufacturer, supplier, or distributor, without permission of the PAH."	Distributors typically have no interaction or permission from a PAH. What needs to be clear is that the part must have been "accepted by" the PAH and have "traceability to" that PAH.	Change the wording to: "Parts shipped directly to the end user by a manufacturer, supplier, or distributor, must show acceptance of the parts by the PAH and document traceability to the PAH."	<p>Partially Adopted.</p> <p>Enhanced following Note as presented below and added reference to FAA AC 21-43 for added information.:</p> <p>Note: Some suppliers to a PAH have direct ship authority to the end user without the parts being originally processed by the PAH or its associate facility's receiving inspection facilities. However, direct ship authority must be authorized in writing by the PAH or associate facility and does not apply to parts not specifically included in the PAH's permission document. The supplier must provide a signed direct ship declaration and a statement of conformance with the shipment. (Additional information on direct ship authority can be found in FAA AC 21-43, <i>Production Under 14 CFR Part 21, Subparts F,G,K, and O.</i>)"</p>
41.	Pg B-4, ¶B.1.13.1 through B.1.13.6	See Item 23.	See Item 23.	Delete as redundant or provide the information within the appropriate section in the main body so it is included as part of the defined processes of the purchaser.	<p>Non- Concur.</p> <p>The information in the form of examples of what form unapproved parts may take is relevant and useful. Regarding redundant, although para #5 mentions some irregular characteristics to look for when received parts, the examples in the unapproved parts definition are not otherwise available in another section of the AC. The definition and examples as presented in the AC are useful and properly placed.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
42.	Pg B-4, ¶B.1.13.1	<p>It is unclear how “manufacturer” is used and defined here. Suppliers manufacture parts but ... aren’t manufacturers. A manufacturer who provides to the PAH is referred to and defined as a supplier but in this case may be a manufacturer. A certificate holder may also be a PAH and is referred to as a manufacturer as well.</p> <p>The use of manufacturer, supplier or distributor adds little to the message and can be deleted removing risk of ambiguity.</p>	Lack of clarity.	Change to “Parts shipped directly to the end user without permission of the PAH.”	<p>Adopted.</p> <p>Reworded definition as follows:</p> <p>“Supplier produced parts for an approved manufacturer directly shipped to end users without the PAH’s authorization or separate PMA.”</p> <p>See comment #40 for enhanced “Note” to the definition.</p>
43.	Pg B-4, ¶B.1.13.1	The note discusses direct ship authority but that the authority granted may limit which parts can be shipped. It is also unclear how the user will know that “direct ship authority” exists and the limits of permission. Review of AC 20-62 and AC 21-45 don’t seem to clarify this issue either. Finally, this is a process better discussed within the body of the AC and not in the definition.	Incomplete.	Reword and add: “Some ...included in the PAH’s permission document. <u>Evidence of the PAH’s permission and limitations thereof must be included with the parts (see Orders 8120.21 and 8120.23).</u> ”	<p>Partially Adopted.</p> <p>Added content to Note as presented below:</p> <p>“Some suppliers to a PAH have direct ship authority to the end user without the parts being originally processed by the PAH or its associate facility’s receiving inspection facilities. However, direct ship authority must be authorized in writing by the PAH or associate facility and does not apply to parts not specifically included in the PAH’s permission document. The supplier must provide a signed direct ship declaration and a statement of conformance with the shipment. (Additional information on direct ship authority can be found in FAA AC 21-43, Production Under 14 CFR Part 21, Subparts F,G,K, and O.)”</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
44.	Page B-4 Paragraph B.1.13.2	This paragraph has an exception that is not included in the notes. A part that does not appear to meet type design may have gone through an approved Material Review Board (MRB) process and have been properly dispositioned which would allow the part to be used as meeting type design.	If the nonconformance was properly reviewed and a decision was made through an approved MRB process, that part would then meet type design.	Add a new note that states: "A part that does not appear to meet type design may have gone through an approved Material Review Board (MRB) process and been properly dispositioned, that part would then meet type design.	<p>Non-Concur.</p> <p>The comment is factually correct but, a recommendation to add a note explaining this specific criteria serving as an exception seems much too detailed and intricate a notion to place into the AC. The comment is based on a hypothetical – "If the nonconformance was reviewed..." is a conditional statement followed by another conditional statement "...may have gone through an approved MRB process..." Unless a document accompanies the part to inform the recipient of this process, it can only be discovered through follow up questions and inquiry. The basic premise of the definition is that a quality escape is ineligible for installation on a product. The definition is broad in context by stating that "... parts that have passed through a PAH quality system that do not conform to the approved design" ...are unapproved parts, is appropriate. This would also cover a part that had not been approved via an MRB process. No change warranted.</p>
45.	Pg B-4, B.1.13.6	These are criteria not definitions and may be missed as such since it is in the appendix for definitions.		Move to main body most likely §5.	<p>Non-Concur.</p> <p>The comment ignores the purpose of para B.1.13, (definition of "Unapproved Part"). Each sub- paragraph (B.1.13.1 – B.1.13.6) is an example of an unapproved part. The examples expand the readers knowledge of the concept and also clarifies instances where a SUP report would not be warranted. It is appropriate and valuable to the reader.</p>

AFS-300

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	Pg 1/Par 2	Change as recommended.	Use of persons aligns with the language used in 14 CFR parts 21 & 43. Additionally the definition of persons in 14 CFR part 1 touches a broader audience than just “aircraft maintainers”.	Delete “ aircraft maintainers ” and replace with “ persons ”.	Adopted.
2.	Pg 1/Par 5	Change as recommended.	Adding procurement, receiving and subsequent stresses the complexity of the aircraft parts control process and flows with the information within this AC.	Revise last sentence as follows; “These steps will help prevent the procurement, receiving, and subsequent installation of unapproved parts into aircraft and aviation components.”	Adopted.
3.	Pg 2/Par 5.2	Change as recommended.	“Receiving Inspection” is the term that Industry and FAA ASIs are familiar with. In relation to aircraft parts AC 20-154 and the 8900.1 both speak to “Receiving Inspections” not “Acceptance Procedures”.	Revise title from “ Acceptance Procedures ” to “ Receiving Inspection ”.	Adopted.
4.	Pg 2/Par 5.2	Change as recommended.	Improves readability and potential understanding.	Revise as follows; “ An effective receiving inspection should address the following suggested areas.”	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
5.	Pg 3/ Par 5.2	Change as recommended.	AC 20-154 is additional guidance that pertains to developing a receiving inspection.	Add following sub item; 5.2.9 For detailed guidelines on the development of a receiving inspection system refer to AC 20-154, Guide for Developing a Receiving Inspection System for Aircraft Parts and Material.	Adopted.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
6.	Pg 3/Par 5.3	<p>Change as recommended</p> <p>(Continued below)</p>	<p>The addition of this additional language emphasizes the end users regulatory responsibilities related to part suppliers, not just the PAH responsibilities. This supports the receiving inspection process defined in FAA Order 8900.1, AC 20-154 and this AC.</p> <p>(Continued below)</p>	<p>Add the following information after current information under “Supplier Evaluation”; Additionally, under 14 CFR, part 21 a person, (operator, repair agency or mechanic) must ensure that all replacement parts meet or exceed original certification standards. You are responsible to ensure that the vendors and suppliers that you contract with have the qualifications to provide products/parts that meet the regulatory requirements under 14 CFR parts 21 and 43.</p>	<p>Partially Adopted:</p> <p>Add 2nd paragraph: “Although the supplier evaluation function is not required for repair stations and non-PAH holder facilities, repair stations are required to ensure each person maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition. To ensure that only aviation quality materials are used in the repair of parts and components these facilities should follow the guidance provided in AC 20-154, <i>Eligibility, Quality, and Identification of Aeronautical Replacement Parts</i> and AC 20-62, <i>Guide for Developing a Receiving Inspection System for Aircraft Parts and Material</i>, to help prevent the introduction of un-airworthy parts into inventories.”</p> <p>14 CFR 21.8 and 21.9 regulate the production and sale of articles. 21.8 and 21.9 do not imply that the operator, or mechanic are responsible for “...ensuring that replacement parts meet or exceed original certification standards” and are not related to continued airworthiness or maintenance.</p> <p>Part 21.137 <i>Nonconforming product and article control</i>, also is not connected to the installer of a part/article in maintenance operations. This section is solely concerned with the quality system internal to the production certificate (PC) owner producing products, (Product = aircraft, aircraft engine, or propeller). The quality system of the PC owner must ensure that products or articles conform to their approved design when installed on a TC product.</p> <p>(Continued below)</p>

6. continued	Pg 3/Par 5.3 (Continued)				<p>This does not imply that a maintenance mechanic in a repair station or other maintenance facility has the same responsibility.</p> <p>Discussion with the commenter yielded 43-13 (b) as a source for the recommendation. 43.13(b) requires that persons performing maintenance on aircraft (and engines, propeller, etc.) with U.S. certificate, or foreign-registered civil aircraft ... operating in the U.S. under Part 121 or 135, [43.1(a)(1), (2), and (3) <i>Applicability</i>] “...shall do the work in such a manner and use materials of such quality, that the condition of the aircraft, airframe, engine, propeller, or appliance .. will be at least equal to its original or properly altered condition with regard to function, strength ...”. It does not say that the installer is the responsible person to ensure that the supplier is qualified to provide replacement articles (parts and components) that conform to type design. It says that the item worked on must be equal to its original ... condition. That is different from ensuring supplier qualifications as recommended.</p>
7.	Pg5/ Par 7	Change as recommended.	Part 3 speaks to persons who make records or makes statements related to products and parts, specifically false and misleading statements.	Add additional Related Regulation; 7.1.2 Part 3 General Requirements	Non-Concur: No value added. There are dozens of additional references that could be added for generic purposes. This is not specifically relevant to the intended audience and the detection of SUPs. No change.
8.	Pg5/ Par 7	Change as recommended.	This supports the new information under paragraph 5.3, 121.363 speaks to the Airworthiness responsibility of a Part 121 operator related to “airframes, aircraft engines, propellers, appliances, and parts thereof”.	Add additional Related Regulation; 7.1.7 Part 121 Operating Requirements: Domestic, Flag, and Supplemental Operations	Non-Concur: Not specifically relevant to the detection of SUPs.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
9.	Pg5/ Par 7	Change as recommended.	This supports the new information under paragraph 5.3, 135.413 speaks to the Airworthiness responsibility of a Part 135 operator related to “airframes, aircraft engines, propellers, rotors, appliances, and parts”.	Add additional Related Regulation; 7.1.8 Part 135 Operating Requirements: Commuter and On-Demand Operations and Rules Governing Persons On Board Such Aircraft	Non-Concur: Not specifically relevant to the AC audience and the detection of SUPs. No change.
10.	Pg 5/Par 7	Change as recommended.	Corrects numbering after adding additional related regulations.	Renummer section 7.1 sub paragraphs.	Non-Concur: Other recommendations pertaining to para 7 not adopted – recommendation is therefore moot.
11.	Pg 5/Par 8	Change as recommended.	Correct Order sequencing	Under Related Reading Material move FAA Order 1070.1 FAA Hotline Program from 8.1.3 to 8.1.1	Partially Adopted: Will move to para 8.1.2, after SUP Order entry.
12.	Pg 5/Par 8	Change as recommended.	FAA order 8900.1 references, references speak to approved parts and Sup Program as it relates to CFR parts 91, 121, & 135.	Add additional Related Reading Material; 8.1.5 FAA Order 8900.1 Volume 6, Chapter 2, Section 27 Safety Assurance System: Conducting a Program Manager/Air Carrier/Air Agency Inspection to Detect Unapproved Parts	Non-Concur: Recommendation is citing guidance specific to FAA employees/ASIs. The AC guidance is directed to the aviation community at large on the detection of SUP. The proposed change is not specifically relevant to the intended audience.
13.	Pg 5/Par 8	Change as recommended.	AC 20-154 supports paragraph 5.2	Add additional Related Reading Material; 8.1.8 AC 20-154, Guide for Developing a Receiving Inspection System for Aircraft Parts and Material	Adopted.

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
14.	Pg 5/Par 8	Change as recommended.	Corrects numbering after adding additional related reading material	Renumber section 8 sub paragraphs	Adopted. Changed as required
15.	Pg B-2/Item B.1.6	Change as recommended.	This revised language clearly supports the "Improper Maintenance" definition in FAA Order 8120.16.	Revise note under Part(s) Not Eligible for Installation as follows: "Note: Parts that have been maintained, repaired, or returned to service by persons or facilities not authorized to perform these operations, or in accordance with data that is unacceptable to the administrator does not necessarily cause the part to become an unapproved part pursuant to 14 CFR, part 21.8 and 21.9. However, such action does render the part ineligible for installation on a TC product pursuant to 14 CFR, part 43. "	Partially Adopted: First recommended phrase change is unnecessary to the focus of the paragraph. Second phrase at end of paragraph is adopted. Will revise last sentence to read: "However, such action does render the part ineligible for installation on a TC product, until the part is properly returned to service by a person authorized to perform that action pursuant to part 43. "

AIR-500

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
1.	Page 1, Paragraph 1 and UNIVERSAL	The word "appendix" is capitalized.	Consistency of formatting	Change "Appendix" to lower case here and throughout the document. Per GPO Manual, section 3.9.: "A common noun used with a date, number, or letter, merely to denote time or sequence, or for the purpose of reference, record, or Capitalization Rules 29 temporary convenience, does not form a proper name and is therefore not capitalized."	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
2.	Page 1, Paragraph 2	The comma after “distributing aircraft parts” is unnecessary and could confuse the reader.	Clarity	Please consider deleting the comma after “distributing aircraft parts.”	Adopted
3.	Page 1, Paragraph 2 and Universal	There is a comma missing after “overhaul.”	Consistency of formatting/ Clarity	<p>Please add a comma after “overhaul” in this sentence and in all similar occurrences throughout the document (see GPO Style Manual, section 8.42).</p> <p>RULE: (Section 8.42)</p> <p>“[A comma is used] after each member within a series of three or more words, phrases, letters, or figures used with and, or, or nor.” For example:</p> <p>“red, white, and blue horses, mules, and cattle; but horses and mules and cattle by the bolt, by the yard, or in remnants a, b, and c neither snow, rain, nor heat 2 days, 3 hours, and 4 minutes (series); but 70 years 11 months 6 days (age)”</p>	Adopted
4.	Page 2, Paragraph 5.1.2.3	The verb “is” refers to “sales quotes or discussions” and should be in the plural form.	Grammar	<p>Please change the verb “is” to “are”, as follows:</p> <p>“Sales quotes or discussions from unidentified distributors that imply an unlimited supply of parts, components, or material are available to the end user.”</p>	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
5.	Page 2, Paragraph 5.1.2.4	The comma after “FAA approval” is unnecessary and may lead to confusion. There should be a comma after “altered”.	Clarity	In order to make this sentence a little clearer for the reader please consider striking the comma after “FAA approval” and inserting a comma after “altered”, as follows: “A distributor and/or supplier’s inability to provide substantiating documentation that the part was produced in accordance with an FAA approval or inspected, repaired, overhauled, preserved, or altered, pursuant to 14 CFR, part 43.”	Adopted
6.	Page 2, Paragraph 5.1.2.4, NOTE and UNIVERSAL	In the first sentence, there is a comma missing after “AC 00-56”.	Consistency of formatting	Insert a comma after “AC 00-56” in the first sentence. Correct similar occurrences throughout the document.	Adopted
7.	Page 2, Paragraph 5.1.2.4, NOTE	In the second sentence, it seems like starting the sentence with “This” instead of “The” would be clearer to the reader.	Clarity	For clarity, consider starting the second sentence with “This” instead of “The”.	Adopted
8.	Page 2, Paragraph 5.1.2.4, NOTE	In the fourth sentence, “on the Internet” is unnecessary.	Ease of reading	Consider deleting “on the Internet” in the fourth sentence.	Adopted
9.	Page 3, Paragraph 5.2.4	Though it is pretty clear that “shelf life and/or life limit” refers to parts, it might be a good idea to remind the reader.	Clarity	Consider inserting “of the part” after “life limit”, as follows: “Ensure that the shelf life and/or life limit of the part has not expired, if applicable.”	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
10.	Page 3, Paragraph 5.3	The comma after “calibration, etc.)” is unnecessary and could make the sentence confusing to the reader.	Clarity	Remove the comma after “calibration, etc.)”, as follows: “FAA regulation 14 CFR, part 21 requires the quality system of a PAH to provide a means of determining that supplier-produced components (e.g., materials, parts, and subassemblies) or services (e.g., processes, calibration, etc.) conform to FAA-approved design data and are in a condition for safe operation.”	Adopted
11.	Page 4, Paragraph 5.4	Moving “AC 20-62 was published” to the beginning of the first sentence and removing the comma after “FAA regulations” could make the first sentence easier to read.	Ease of reading	Consider moving “AC 20-62 was published” to the beginning of the sentence. Also, consider removing the comma after “FAA regulations”, as follows: “ AC 20-62 was published to promote compliance with FAA regulations and to offer further guidance and clarification relevant to the eligibility of aeronautical replacement parts.”	Adopted
12.	Page 4, Paragraph 6.2	The second sentence is not a complete sentence; therefore, because it introduces the URL, it should either end in an em dash or made a complete sentence and ended with a colon.	Clarity	For clarity, consider adding “the following URL” between “at” and “:”, as follows: “The form is included in this AC and may be found at any FAA office or on the FAA Web site at the following URL: http://www.faa.gov/aircraft/safety/programs/sups.” RULE: When a complete sentence introduces a list—an independent clause—use a colon. When introducing a list with a dependent clause, use an em dash. Throughout the document, please change all appropriate occurrences to maintain consistency.	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
13.	Page 4, Paragraph 6.2.2	The parentheses around the area codes are redundant.	Consistency of formatting	<p>Please delete the parentheses around the area codes, as follows:</p> <p>If a reporter is unable or prefers not to complete FAA Form 8120-11, a SUP report may be initiated by calling the FAA Hotline office at 1-800-255-1111 or 1-866-835-5322.</p>	Adopted
14.	Page 5, Paragraph 8.1.1	The title of Order 8120.16 is incorrectly listed as “ <i>Suspected Unapproved Parts Program.</i> ”	Accuracy of information	Please update title of Order 8129.16 from “ <i>Suspected Unapproved Parts Program</i> ” to “ <i>Processing Reports of Suspected Unapproved Parts.</i> ”	<p>Non-Concur</p> <p>The reference is correct. FAA order 8120.16 is currently under revision (8130.16A). The new title is: “Suspected Unapproved Parts Program.”</p>
15.	Page 6, Paragraphs 9.2 and 9.3 and UNIVERSAL	In the third sentence in 9.2 and in the first sentence of 9.3, it is not necessary to state the title of Order 8120.16 because the title was mentioned in section 8 “Related Reading Material.”)	Ease of reading/Consistency of formatting	<p>Consider deleting the title of 8120.16 (Processing Reports of Suspected Unapproved Parts) and related commas in paragraph 9.2, as follows:</p> <p>“It successfully coordinated and supported the investigation of those parts until management of the SUP program was turned over to the FAA at large with the issuance of FAA Order 8120.16; Processing Reports of Suspected Unapproved Parts; in July 2008.”</p> <p>Also, consider deleting the title of 8120.16 (and surrounding parentheses) in paragraph 9.3, as follows:</p> <p>“FAA Order 8120.16 (Processing Reports of Suspected Unapproved Parts)-realigned the responsibility for processing reports of SUP within the FAA’s Aviation Safety line of business in 2007.”</p> <p>Delete similar occurrences throughout the document. (Once a reference is mentioned in the document, it is not necessary to repeat the title in occurrences that follow.)</p>	<p>1. Non-Concur Since the title of the order will change, the previous title as written here is required to differentiate the previous publication with a different title from the current order 8120.16A to be published prior to the publication of the AC.</p> <p>2. Adopted</p> <p>3. The second reference in 9.3 refers to the previous order and will be deleted as unnecessary.</p> <p>No other instances detected in the AC.</p>

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
16.	Page A-1, Suspected Unapproved Parts Report form	It could just be an issue with Adobe Acrobat but there seem to be some font inconsistencies throughout the table.	Consistency of formatting	Please ensure font consistency throughout form.	Adopted
17.	Page A-1, Suspected Unapproved Parts Report form, Section 8	The colon is missing after "State."	Consistency of formatting	Insert colon after "State" in section 8.	Adopted
18.	Page A-1, Suspected Unapproved Parts Report form, Section 8 and Section 10	<p>There appears to be an extra space between the hyphenated descriptions of the persons who supplied or repaired the part in sections 8 and 10. For example—</p> <p>"Air Carrier-Certificate #" "Mechanic-Certificate #" "Repair Station-Certificate #"</p>	Consistency of formatting	Ensure there are no extra spaces between the "Air Carrier," "Mechanic," and "Repair Station" and "=Certificate #".	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
19.	Page A-1, Suspected Unapproved Parts Report form, Sections 1, 8, 10	<p>Though they function as section headings in this table, the following phrases would be easier to read in sentence case:</p> <p>“1. Date the Part Was Discovered”</p> <p>“8. Name, Address, and Description of the Company or Person Who Supplied or Repaired the Part”</p> <p>“10. Name and Address of (the Company or Person) Where the Part Was Discovered”</p> <p>“Check One of the Following Applicable to the Company or Person Who Discovered the Part” (section 10)</p>	Ease of reading	<p>Consider changing the following to sentence case:</p> <p>“1. Date the Part Was Discovered”</p> <p>“8. Name, Address, and Description of the Company or Person Who Supplied or Repaired the Part”</p> <p>“10. Name and Address of (the Company or Person) Where the Part Was Discovered”</p> <p>“Check One of the Following Applicable to the Company or Person Who Discovered the Part”</p> <p>as follows:</p> <p>“1. Date the part was discovered”</p> <p>“8. Name, address, and description of the company or person who supplied or repaired the part”</p> <p>“10. Name and address of (the company or person) where the part was discovered”</p> <p>“Check one of the following, applicable to the company or person who supplied or repaired the part”</p>	<p>Non-Concur:</p> <p>Although the form is under revision the recommendation as presented adds no value to the form. Actually the capitalization is (opinion) more attractive.</p>
20.	Page A-1, Section 10	The checkboxes in section 10 are not all aligned to the left margin.	Consistency of formatting	Ensure that all checkboxes are aligned to the left margin.	Adopted

Item No.	Page and Paragraph No:	Comment:	Reason:	Recommendation	AIR-100 Disposition
21.	Page A-2, Section 8 (Table)	In the second column in the table in section 8, the period after “OEM” is unnecessary.	Consistency of formatting	Strike the period after “OEM”, as follows: “(OEM)”	Adopted
22.	Page B-1, Paragraph B.1.1	In the first sentence, the comma after “term” and the comma after “approved parts” are unnecessary and could confuse the reader.	Grammar	Strike the comma after “term” and the comma after “approved parts”, as follows: The term “approved parts” is not restricted to “a part that has received a formal FAA approval.”	Adopted
23.	Page B-2, Paragraph B.1.5	The second sentence could be written a bit clearer.	Clarity/Ease of reading	Please consider changing the second sentence to the following: “Use the following toll-free telephone numbers to report unsafe practices that affect aviation safety: 800-255-1111 or 866-835-5322. Please include the manufacture, distribution, or use of a SUP.”	Adopted
24.	Page B-2, Paragraph B.1.5	In the second sentence, the parentheses around the phone numbers are unnecessary.	Consistency of formatting	Consider striking the parentheses around the phone numbers, as follows: “...800-255-1111 or 866-835-5322.”	Adopted
25.	Page C-1, Paragraph 1	This sentence would be easier to read if the numbers were removed.	Ease of reading	Consider striking the numbers “1)” and “2)” and inserting “either” after “template and”, as follows: “...template and either emailing it to 9-AWA-AVS-AIR500-Coord@faa.gov or faxing it to the attention of the AIR Directives Management Officer at 202-267-3983.”	Adopted