# Safety Attribute Inspection (SAI) Data Collection Tool 1.3.21 Parts Pooling (AW)

## **ELEMENT SUMMARY INFORMATION**

Purpose of this Element (certificate holder's responsibility):

 To administer the Parts Pool Agreements by ensuring that parts pooling activities are conducted as specified in the certificate holder's manual and operation specifications paragraph D081.

**Objective** (FAA oversight):

- To determine if the certificate holder's Parts Pooling process meets all applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Parts Pooling process incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Parts Pooling process.

#### Specific Instructions:

• Intentionally left blank

### SUPPLEMENTAL INFORMATION

#### Specific Regulatory Requirements (SRRs):

SRRs:

119.43(b) 119.43(b)(1) 119.43(b)(2) 119.43(c) 119.51(c) 121.135(a)(1) 121.135(b)(2) 121.135(b)(3) 121.361(b) D.081 D.081(a) D.081(b) D.081(c)

#### Related CFRs & FAA Policy/Guidance:

- Related CFRs: Intentionally left blank
- FAA Policy/Guidance:
  - FAA Order 8900.1, Volume 2, Chapter 3, Section 11 FAA Order 8900.1, Volume 2, Chapter 82, Section 1 FAA Order 8900.1, Volume 3, Chapter 39,

### **SAI Section 1 - Procedures Attribute**

**Objective:** Procedures, instructions, and information are

documented methods for accomplishing a process. The certificate holder's policies should establish their compliance posture. Policies may be stand-alone statements, or they may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural

questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tas	Tasks		
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Review the information listed in the Supplemental Information section of this DCT.		
2. Review the duties and responsibilities for management and other personnel identified certificate holder who accomplish the Parts Pooling process.			
3.	Review the certificate holder's Parts Pooling process to ensure it contains the policies, procedures, instructions and information necessary for personnel to perform their duties and responsibilities with a high degree of safety.		

Questions			
	To meet this objective, the inspector must answer the following questions:		
1.	Does the certificate holder's Parts Pooling process meet the specific regulatory and FAA policy requirements:		
1.1.	Does the certificate holder Parts Pooling process include that it is subject to the following conditions and limitations: SRRs: D.081(a); D.081(b)		
1.1.1	Only the parts pool participants listed in table 1 of the D081 operations specifications will be eligible to provide parts to the certificate holder? SRRs: D.081(a)	<ul><li>☐ Yes</li><li>☐ No, Explain</li><li>☐ Not Applicable</li></ul>	
1.1.2	The certificate holder will not use any part provided by any participant identified in table 1 of the D081 operations specification unless that part complies with applicable provisions of the Federal Aviation Regulations and the certificate holder's manual? SRRs: D.081(b)	☐ Yes ☐ No, Explain ☐ Not Applicable	
1.2.	Does the certificate holder's manual include: SRRs: D.081(c)		
1.2.1	Administration of Parts Pooling agreements listed in operations specifications paragraph D081? SRRs: D.081(c)	☐ Yes ☐ No, Explain	
1.2.2	Related policies and maintenance procedures, including those procedures pertaining to the control over subsequent revisions of maintenance data by the foreign air carrier? SRRs: D.081(c)	☐ Yes ☐ No, Explain	

1.3.	<ul> <li>Does the certificate holder's Parts Pooling process include instructions and information necessary for personnel to accomplish the following for airframe components, powerplants, appliances, and spare parts which have been maintained, altered, or inspected by persons employed outside of the United States who do not hold U.S. airman certificates:</li> <li>SRRs: 121.135(a)(1); 121.361(b) <i>Related Design JTIs:</i></li> <li>1. Check that the Certificate Holder's manual system includes instructions and information necessary to allow the personnel concerned to perform their duties and responsibilities of approving for return to service airframe components, powerplants, appliances, and spare parts thereof, that have been maintained, altered, or inspected by persons employed outside the United States who do not hold U.S. airman certificates.</li> <li><i>Sources:</i> 121.135(a)(1); 121.361(b); 121.379(b) <i>Interfaces:</i> 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.1(AW); 2.1.1(OP)</li> </ul>	
1.3.1	<ul> <li>Return to service and use of these parts?</li> <li>SRRs: 121.361(b)</li> <li><i>Related Design JTIs:</i></li> <li>1. Check that the Certificate Holder's manual system includes instructions and information necessary to allow the personnel concerned to perform their duties and responsibilities of approving for return to service airframe components, powerplants, appliances, and spare parts thereof, that have been maintained, altered, or inspected by persons employed outside the United States who do not hold U.S. airman certificates.</li> <li><i>Sources:</i> 121.135(a)(1); 121.361(b); 121.379(b)</li> <li><i>Interfaces:</i> 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3(AW); 1.3.7(AW); 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 2.1.1(OP)</li> </ul>	☐ Yes ☐ No, Explain
1.3.2	Provide for surveillance of facilities and practices to ensure that all work performed on the parts is accomplished in accordance with the certificate holder's manual? SRRs: 121.361(b)	☐ Yes ☐ No, Explain
1.4.	Does the certificate holder's Part Pooling process contain procedures for filing an application to amend operations specifications paragraph D081? SRRs: 119.51(c)	Yes No, Explain Not Applicable
1.5.	<ul> <li>Does the certificate holder's Part Pooling process comply with the guidance contained in FAA Order 8900.1?</li> <li><i>Related Design JTIs:</i></li> <li>1. Check that the Certificate Holders manual system contains instructions and information necessary to allow the personnel concerned to perform their duties and responsibilities that the Parts Pool Agreement Authorization applies only to FAR Part 121 operators operating outside the U.S. Sources: 121.135(a)(1); FAA Order 8900.1, Volume 3, Chapter 39, Paragraph 3-3759 Interfaces: 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3(AW); 1.3.4(AW); 1.3.7(AW); 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 1.3.19(AW);</li> </ul>	☐ Yes ☐ No, Explain

<ul> <li>2.1.1(AW); 2.1.1(OP)</li> <li>Check that the Certificate Holders manual system contains instructions and information necessary to allow the personnel concerned to perform their duties and responsibilities that the Parts Pool Agreement Authorization that all U.S. participants in the pool must amend their operations specifications to reflect the changes of new participants or locations.</li> </ul>	
Sources: 121.135(a)(1); FAA Order 8900.1, Volume 3, Chapter 39, Paragraph 3-3759B2	
<i>Interfaces:</i> 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3(AW); 1.3.4(AW); 1.3.7(AW); 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 1.3.19(AW); 2.1.1(AW); 2.1.1(OP)	
3. Check that the Certificate Holder's manual system contains procedures to inspect the foreign facility participant identified on the Ops Specs, at least biennial, to ensure conformity to the Certificate Holder's manual in supplying the required parts.	
Sources: FAA Order 8900.1, Volume 3, Chapter 39, Paragraph 3- 3759B1	
<i>Interfaces:</i> 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3(AW); 1.3.4(AW); 1.3.7(AW); 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 1.3.19(AW); 2.1.1(AW); 2.1.1(OP)	
4. Check that the Certificate Holder's maintenance/inspection program contains control and accountability over the means for identifying all Category II/III components used in the applicable aircraft systems from the existing parts pool and control of spare parts.	
Sources: FAA Order 8900.1, Volume 2, Chapter 3, Section 11 Para 4- 468B	
<i>Interfaces:</i> 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3(AW); 1.3.4(AW); 1.3.7(AW); 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 1.3.19(AW); 2.1.1(AW); 2.1.1(OP)	
1.6.       Does the certificate holder s manual contain the required references to, or excerpts from, the operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)?       SRRs: 119.43(b)	
1.7.       If the certificate holder s manual includes excerpts from its operations specifications, are the excerpts clearly identified as part of the operations specifications?          \[             \begin{aligned}             Yes \\             \begin{aligned}             No, Explain \\             Not Applica             \end{aligned}             Not Applica	
SRRs: 119.43(b)(1)	
1.8.       Does the certificate holder s manual require compliance with operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)?       SRRs: 119.43(b)(2)	
1.9.       Does the certificate holder s manual contain a method for keeping all persons engaged in its operations informed of the provisions of the operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)?       SRRs: 119.43(c)	
2. Does the certificate holder's manual contain general policies for the Parts Pooling process that comply with the SRRs?	
SRRs: 121.135(b)(1); 121.361(b); D.081	

	Related Design JTIs:		
	1. Check that the Certificate Holder's manual system in only the parts pool participants listed in the D081 Op Specifications table, shall be eligible to provide parts Holder.	eration	
	Sources: D.081(a); D.081(c)		
	Interfaces: 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 2.1.1(AW); 2		
	2. Check that the Certificate Holder's manual system a shall not use any part provided by any participant ide D081 Operation Specifications table unless that part applicable provisions of the Federal Aviation Regulat Certificate Holder's manual.	ntified in their complies with	
	Sources: D.081(b); D.081(c)		
	Interfaces: 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 2.1.1(AW); 2	(AW); 1.3.7(AW); 2.1.1(OP)	
	3. Check that the Certificate Holder's manual system interpretent the Administrator may amend its operations specificated deviation from those provisions of 14 CFR part 121 states would prevent the return to service of airframe compared powerplants, appliances, and spare parts thereof become have been maintained, altered, or inspected by person outside the United States who do not hold U.S. airmated and the service of a states who do not hold U.S. airmated and the service of	itions to permit ubpart L that onents, cause those items ons employed	
	Sources: 121.361(b); D.081(c)		
	Interfaces: 1.1.1(AW); 1.2.1(AW); 1.3.1(AW); 1.3.3 1.3.10(AW); 1.3.11(AW); 1.3.15(AW); 2.1.1(AW); 2		
3.	Does the certificate holder's manual reference the appropriate Regulations listed in the Supplemental Information section of attribute inspection (SAI)? SRRs: 121.135(b)(3)		☐ Yes ☐ No, Explain
4.	Does the certificate holder's manual contain the duties and repersonnel who will accomplish the Parts Pooling process? SRRs: 121.135(b)(2)	esponsibilities for	☐ Yes ☐ No, Explain
5.	Does the certificate holder's manual include instructions and personnel to meet the requirements of the Parts Pooling proc SRRs: 121.135(a)(1)		☐ Yes ☐ No, Explain

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	SAI Section 1 - Procedures Attribute Drop-Down Menu
1.	No procedures, policy, instructions or information specified.
2.	Procedures or instructions and information do not identify (who, what, when, where, how).
3.	Procedures, policy or instructions and information do not comply with CFR.
4.	Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5.	Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6.	Procedures, policy or instructions and information unclear or incomplete.
7.	Documentation quality (e.g., unreadable or illegible).
8.	Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.	Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.	Other.

#### **SAI Section 2 - Controls Attribute**

**Objective:** Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the system to ensure that the most important policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

Tasks		
	To meet this objective, the inspector must accomplish the following tasks:	
1	Review the control questions below.	
2	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented.	

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Parts Pooling process:	
1.1.	Is there a control or controls in place to ensure that training is provided to personnel performing the Parts Pooling process?	☐ Yes ☐ No, Explain
1.2.	Is there a control or controls in place to ensure that only Parts Pool participants listed in paragraph D081 of the certificate holder's operations specifications are used to provide parts to the certificate holder?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.3.	Is there a control or controls in place to ensure that no part provided by a Parts Pool participant is used unless that part complies with the applicable provisions of the Federal Aviation Regulations and the certificate holder's manual?	☐ Yes ☐ No, Explain
1.4.	Is there a control or controls in place to ensure that the Parts Pooling process is properly administered?	☐ Yes ☐ No, Explain
1.5.	Is there a control or controls in place to ensure that all work performed by persons employed outside the United States who do not hold a U.S. airman certificate is accomplished in accordance with the certificate holder's manual?	☐ Yes ☐ No, Explain
1.6.	Is there a control or controls in place to ensure that the certificate holder provides for the surveillance of facilities and practices to ensure that all work performed is accomplished in accordance with the requirements of the certificate holder's manual?	☐ Yes ☐ No, Explain
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Parts Pooling process?	☐ Yes ☐ No, Explain

	SAI Section 2 - Controls Attribute Drop-Down Menu		
1.	No controls specified.		
2.	Documentation for the controls do not identify (who, what, when, where, how).		
3.	Controls incomplete.		
4.	Controls could be circumvented.		
5.	Controls could be unenforceable.		
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).		
7.	Other.		

### SAI Section 3 - Process Measurement Attribute

**Objective:** Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety-related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection-related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tas	Tasks			
	To meet this objective, the inspector must accomplish the following tasks:			
1.	Review the process measurement questions below.			
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.			

Questions			
	To meet this objective, the inspector must answer the following questions:		
1.	Does the certificate holder's Parts Pooling process include the following process measurements:		
1.1.	Process measurement or process measurements that would reveal if training was provided to personnel performing the Parts Pooling process?	☐ Yes ☐ No, Explain	
1.2.	Process measurement or process measurements that would reveal if anyone other than Parts Pool participants listed in paragraph D081 of the certificate holder's operations specifications was used to provide parts to the certificate holder?	Yes No, Explain Not Applicable	
1.3.	Process measurement or process measurements that would reveal if any parts provided by a Parts Pool participant and used by the certificate holder failed to comply with the applicable provisions of the Federal Aviation Regulations and the certificate holder's manual?	☐ Yes ☐ No, Explain	
1.4.	Process measurement or process measurements that would reveal if the Parts Pooling process was not properly administered?	☐ Yes ☐ No, Explain	
1.5.	Process measurement or process measurements that would reveal if persons employed outside the United States who do not hold a U.S. airman certificate failed to accomplish the work in accordance with the certificate holder's manual?	☐ Yes ☐ No, Explain	

1.6.	Process measurement or process measurements that would reveal if the certificate holder failed to provide for the surveillance of facilities and practices to ensure that all work performed was accomplished in accordance with the requirements of the certificate holder's manual?	☐ Yes ☐ No, Explain
2.	Is there a process measurement or process measurements that would reveal if the certificate holder s policy, procedures, instructions, and information were not followed?	☐ Yes ☐ No, Explain
3.	Does the certificate holder document its process measurement results?	☐ Yes ☐ No, Explain
4.	Does the certificate holder use its process measurement results to improve its programs?	☐ Yes ☐ No, Explain
5.	5. Does the organization that conducts the process measurements have direct access to the person with responsibility for the (element name) process?	☐ Yes ☐ No, Explain

# SAI Section 3 - Process Measurement Attribute Drop-Down Menu

- 1. No process measurements specified.
- 2. Documentation for the process measurements does not identify (who, what, when, where, how).
- 3. Inability to identify negative findings.
- 4. No provisions for implementing corrective actions.
- 5. Ineffective follow-up to determine effectiveness of corrective actions.
- 6. Resources requirements (personnel, facilities, equipment, technical data).
- 7. Other.

### **SAI Section 4 - Interfaces Attribute**

**Objective:** Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different areas within the certificate holder's system must be consistent and complement each other. For the interfaces to be effectively managed, the certificate holder's system should identify and document the interfaces.

Tasks		
	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the interfaces associated with the Parts Pooling process that have been identified along with the individual questions in section 1, Procedures, of this DCT.	
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.	

Questions				
	To meet this objective, the inspector must answer the following questions:			
	NOTE: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.			
1.	Does the certificate holder's system properly address the interfaces that are identified along with the questions in section 1, Procedures, of this DCT?	☐ Yes ☐ No, Explain		
2.	Does the certificate holder document a method for assessing the impact of any changes to the associated interfaces within the	☐ Yes ☐ No, Explain		

# SAI Section 4 - Interfaces Attribute Drop-Down Menu

- 1. No interfaces specified.
- 2. The following interfaces not identified within the Certificate Holder's manual system:
- 3. Interfaces listed are inaccurate.
- 4. Specific location of interfaces not identified within the manual system.
- 5. Other

## SAI Section 5 - Management Responsibility & Authority Attributes

**Objective:** The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks			
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Identify the person who has overall responsibility for the Parts Pooling process.		
2.	Identify the person who has overall authority for the Parts Pooling process.		
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.		
4.	Review the appropriate organizational chart.		

Questions			
	To meet this objective, the inspector must answer the following questions:		
1.	Does the certificate holder clearly identify who is responsible for the quality of the Parts Pooling process?	☐ Yes ☐ No, Explain Name/Title:	
2.	Does the certificate holder clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Parts Pooling process?	☐ Yes ☐ No, Explain Name/Title:	
3.	Does the certificate holder s manual include the duties and responsibilities of those who manage the work required by the Parts Pooling process? SRRs: 121.135(b)(2)	☐ Yes ☐ No, Explain	
4.	Does the certificate holder s manual include instructions and information for those who manage the work required by the Parts Pooling process? SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain	
5.	Does the certificate holder clearly and completely document the responsibility for this position?	☐ Yes ☐ No, Explain	
6.	Does the certificate holder clearly and completely document the authority for this position?	☐ Yes ☐ No, Explain	
7.	Does the certificate holder clearly and completely document its qualification standards for the person having responsibility for the Parts Pooling process?	☐ Yes ☐ No, Explain	
8.	Does the certificate holder clearly and completely document its qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Parts Pooling process?	Yes	
9.	Does the certificate holder clearly and completely document the procedures for delegation of authority for the Parts Pooling process?	☐ Yes ☐ No, Explain	

# SAI Section 5 - Management Responsibility & Authority Attributes Drop-Down Menu

- 1. Not documented.
- 2. Documentation unclear.
- 3. Documentation incomplete.
- 4. Other.