



Federal Aviation Administration

Mr. Dale Gordon Americas Aerospace Quality Group (AAQG) Rolls-Royce Allison P.O. Box 420 Mail Stop: U-24 Indianapolis, IN. 46206-0420

Dear Mr. Gordon:

In November 2000 the Federal Aviation Administration (FAA) was asked to review the AS9100 Quality Systems – Aerospace – Model for Quality Assurance in Design, Development, Production, Installation, and Servicing as a quality system standard for aviation related entities.

During the comprehensive review, the FAA determined that AS9100 (issued 1999-11) to be a comprehensive quality standard containing the basic quality control/assurance elements required by the current Code of Federal Regulations (CFR), Title 14, Part 21. A letter was issued stating that those organizations that chose to implement AS9100, as a foundation for their quality management systems should also ensure that all applicable elements found in CFR Title 14, Part 21 were also addressed.

During the past year your committee reviewed the standard as compared to the matrix that showed the correlation of the AS9100 standard to the regulatory requirements and the current Aircraft Certification System Evaluation Program (ACSEP) criteria. Revision A to the AS9100 standard has been developed and another review has been requested.

The Production and Airworthiness Division (AIR-200) has conducted the review utilizing Revision A of AS9100. The Aircraft Certification Service still believes that the effective implementation of AS9100 – Rev A will continue to enhance an organization's overall performance. The statement found in Section 1, 1. Scope, 1.1 General: states "It is emphasized that the quality management system requirements specified in the standard are complementary (not alternative) to contractual and applicable law and regulatory requirements." is still a requirement that must be adhered to. The Production and Airworthiness Division has also attached a matrix that correlates the AS9100 – Rev A criteria to the regulatory requirements, the current ACSEP survey criteria and the ACSEP Phase II survey criteria.

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In stating that AS9100 – Rev A meets the FAA's expectations, for a manufacturing quality control system, again the FAA is not accepting the registration of quality systems by third parties, to any standard, as compliance to CFR Title 14, Part 21. This is due in that the FAA has no control over their contents, they can be changed by the industry, and they possess no regulatory requirements or enforcement capability. CFR Title 14, Part 21 is the regulatory requirement for FAA production approval holders and it remains their responsibility to demonstrate compliance, including that of their suppliers, to all applicable sections. Any use of third party quality system surveillance is considered a supplier activity by the FAA and must be appropriately controlled.

The Aircraft Certification Service applauds the efforts of the Americas Aerospace Quality Group (AAQG) in taking a leadership role in enhancing aviation quality. If we can be of further assistance, please feel free to contact a member of the Production and Airworthiness Certification Division at (202) 267-8361.

Sincerely,

Frank P. Paskiewicz

Manager, Production and

Airworthiness Certification Division

AS-9100-Revision A

Quality System Model for Quality Assurance in Design, Development, Production, Installation and Servicing - FAR & ACSEP Evaluation Criteria Correlation

AS-9100 Revision A Elements	FAR	Current ACSEP Criteria	Phase II
4.1 Management Responsibilities			
4.1.1 Quality Policy	Doctor Management (1997)	1M1,1M5, 1M2, 1Q4	103, 104
4.1.2 Organization		1311,1112, 1112, 121	103, 104
4.1.2.1 Responsibility and Authority	21.123,	1Q1, 1Q2, 1Q3, 1Q4, 1M1, 1M2, 1M3,	105, 104, 103
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4.1.2.2 Resources	21.123,	1P3, 1S3, 1C3, 5Q1, 4Q7	105, 104, 103
	21.143,		100, 101, 100
	21.303		
4.1.2.3 Management Representative	21.143	1Q4, 1Q2, 14C3, 1C1, 1C2, 1C3, 14C1, 14S1, 14S2	105
4.1.2.4 Process Performer		14S4, 14S5, 14C5	
4.1.3 Management Review		1M5, 1M6, 15M2	104
4.2 Quality System		11013, 11010, 131012	104
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	21.123,	127, 1110	105
	21.605		
4.2.2 Quality System Procedures	21.143,	1M6, 1Q4, 14C3, 1Q6, 14C1	105
	21.605	1110, 101, 1105, 100, 1401	103
4.2.3 Quality Planning	21.143,	1M1, 1M5, 1M6, 1Q5, 14S3, 14C2,	105
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4.2.4 Configuration Management		9	
4.3 Contract Review			
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4.3.2 Review			
4.3.3 Amendment to a Contract			
4.3.4 Records			
4.4 Design Control	100		
4.4.1 General	21.611	2E1, 2E3, 2P1, 2Q1, 2S1, 2E8	Section 2 Part A
4.4.2 Design & Development Planning	21.011	2E1, 2E3, 2E7, 2E9, 2P1, 2Q1, 2S1	Section 2 Part A
4.4.3 Organizational & Technical Interfaces		2P1, 2Q1, 2S1, 2E8, 11E1	203
4.4.4 Design Input		2E9, 2E8, 2E4, 2E5	
4.4.5 Design Output	21.605	2E3, 2S2, 2S3, 2C3, 2C4	112
4.4.6 Design Review	21.003	2P1, 2Q1, 2S1	209, 208, 210, 113
4.4.7 Design Verification	21.607	2E7, 2P1, 2Q1, 2S1 2E7, 2P1, 2Q1, 2S1, 2E3, 4E2, 5E2	203, 113
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4.4.6 Design vandation	21.123,	8C1, 8E1, 8E2	204
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4.4.9 Design Changes	21.125,	2E3 2E4 13E1 2E5 2C2 2C2	205 207 207
1.1.7 Design Changes	21.123, 21.303,	2E3, 2E4, 13E1, 2E5, 2S2, 2C3	205, 206, 207
	21.611		
4.5 Document and Data Control	21.011		
4.5.1 General		1Q6, 2E2, 5Q5, 7Q12, 8Q3, 9Q9, 10Q12, 14S2, 17Q5	108
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AS-9100 Elements	FAR	Current ACSEP Criteria	Phase II
4.6 Purchasing			
4.6.1 General		4P7, 4P8, 4Q8, 4Q9, 10Q8, 10Q9, 10Q10, 10Q11	Section 6
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4.6.4 Verification of Purchased Product		10Q10, 10C1, 10Q8, 10Q9	Section 6
4.7 Control of Customer Supplied Product		10Q4	
4.8 Product Identification and Traceability	45.11, 21.607	10Q8, 10Q9, 10Q11, 12Q5, 4P8, 4P9, 4Q8, 4Q9	418, 419, 420, 427, 428
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4.9.1.2 Control of Production Process Changes		4E2, 4P1, 4P5, 2Q1, 2S1, 2P1, 4P4, 4Q11, 4Q12, 5Q1	407, 401, 403, 421, 517, 522
4.9.1.3 Control of Production Equipment, Tools, and Numerical Control (NC) Machine Programs		7Q3, 7Q6, 7Q8, 7Q9, 7Q10, 7Q11, 7Q14	406, 404, 508, 507, 510, 518, 520, 522
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