The Supplier

The Maintenance Observation Audit

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Inside this issue:

Recently, much discussion has focused on the effectiveness of the current 1A audit process utilizing the CACS-20 checklist. Specifically related to sampling and verifying compliance with an air carrier's maintenance program requirements, the CACS-20 checklist does not direct or guide the auditor to check for compliance with component maintenance requirements – even though a vast majority of Level III's do perform these tasks.

Those carriers that fall under the ATOS (FAA – Air Transportation Oversight System) requirements, and are using CASE as a method of satisfying supplier surveillance requirements, know all too well the question that surfaces from the Inspector's notepad during an SAI (System Analysis Inspection): "Using the CASE Register, how does that satisfy the validation of your specific air carrier maintenance program is being reviewed and tested by the auditor?" Some carriers have the answer well-documented in their manuals through their own procedures such as use of the P&P, Air Carrier Data documents list (Appendix 1), specifying and identifying their maintenance program documents for the auditors to utilize during their on-site sampling of maintenance. To further support a validation measure, some carriers are now requesting all completed CASE-allocated vendor audits from their suppliers. The audits are reviewed and the approved responses are incorporated in to their CASS (Continuous Analysis Surveillance System) programs.

Notwithstanding how your specific carrier is using CASE for CASS, the compliance with the Component Maintenance Manual (CMM) and your carrier's specific maintenance program is one key to measuring the success of your respective outsourcing program –

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as well as your own compliance with the rules.

During our training sessions, we have discussed the need for a more technical audit and attempted to encourage more time on the shop floor verifying that the Repair Station is utilizing the correct manuals, procedures, tooling, parts, and trained individuals. CASE Level IV Evaluators are also encouraging more interaction with maintenance personnel as opposed to manual reviews.

To this point and in the near future, you will see a proposal to modify the CACS-20 checklist to incorporate more maintenance observation activity including materials and maintenance procedures used in the repair process at the allocated vendor. The new format which does not impact the 1A Standard is a shift from the on-site systems reviews to observing maintenance processes on the shop floor and their respective supporting departments.

Basic auditing techniques such as forward and reverse tracing can be used to document and observe maintenance. Some areas of importance include: 1. Are Service Bulletins being accomplished using the proper methods, techniques, manuals and materials required by the CMM? 2. Are PMA parts are being used? 3. Are DER repairs being performed? 4. Are Airworthiness Directives being accomplished as required? These items require air carrier approval prior to use by the Repair facility (including subcontractors).

While system thinking is critical, and we do need to validate it, we are also served by keeping a sharp, focused eye on the processes necessary to ensure that maintenance is controlled, properly being accomplished and any associated risk is minimized. This type of auditing is considered preventative action to ensure quality as opposed to an inspection.

One Level IV Evaluator recently commented that each of us should ask ourselves how we feel when leaving the vendor. Do you feel good about the compliance verifications regarding maintenance? That is the pivotal question at hand. We must ensure that the vendor is following maintenance procedures as required. The proposals for modifying the CACS-20 will guide us through the maintenance observations in a succinct and orderly manner. We respectfully ask that you carefully consider these proposals with your senior management as it will strengthen the carrier's ability to deal with the tough questions we all get from time-to-time. –End-

Accuracy of Register Submittals

By: Craig Seaman, News Letter Chairman
CASE Level III, US Airways

Over the past few years I have found that many of our register transmittals have missing or inaccurate information. This creates a real problem for other members when they access information from the register for their respective vendor files.

As a Level III or IV auditor it is imperative that we all spend a few extra minutes to ensure we are submitting accurate information into the database. We have all run into examples of this when accessing the database to gather information prior to performing an audit. I am going to give a few examples that I have run across.

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1. The name of the repair station (business name). We commonly come across repair stations that have a D/B/A. We need to make sure that the D/B/A information is in the transmittal.
2. Capability codes. When processing our transmittals we need to ensure that we enter all of the capability codes that are listed on the repair stations certificate.
3. Addresses, city, state and country. If we do not enter this information accurately it creates great difficulty for other members to locate a particular vendor in the database.
4. Repair station certificate numbers. Since the certificate numbers may be hard to read, we should go to the FAA website to verify the actual number before we submit our transmittals.
5. Repair station contact information. This information is very important to all of us. When we are preparing to perform an audit, there is nothing more frustrating than not being able to find a good phone number or email address for the repair station contact.

These are a few examples that I have observed, but I am sure we have all run into some of these issues. We can all look back and remember making one of these errors by accident. When we are performing our update to the register, take a few seconds, print and proof read the transmittal prior to hitting the submit button. This will ensure an accurate submission to the register and will be beneficial to the entire membership.

CONSUMABLE MATERIAL SHELF LIFE LIMITS

By: Brian Douglas
Quality Program Manager
Continental Airlines

Many sealants, adhesives and paints as well as various other chemicals have shelf life limits imposed by the manufacturer. Once the manufacturer imposed shelf life limit date has expired, these chemicals must be safely discarded. This concept applies to any company who uses shelf life affected chemicals in the performance of maintenance, alterations, or preventive maintenance on aircraft, engines, propellers or appliances.
FAR 43.13 states:
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 (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

As a Quality Assurance auditor for a major airline, I see many different techniques in use to comply with this regulation. Some are more effective than others but all have the same objective in mind, compliance with FAR 43.13. My experience has taught me that the most effective way to control shelf life is with what I like to call a “fully evolved” shelf life program. Before I explain the definition and practical application of my “fully evolved” shelf life control program concept, I must preface this with the understanding that I am not endorsing or disapproving the theory of evolution in the Darwinian sense, I am just using this concept to relay information.
Shelf life control starts with receiving a chemical into your inventory system. Once you determine that the chemical you received is affected by shelf life requirements imposed by the manufacturer, you should ensure that it is properly

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identified as such. Many of the companies that I visit have created a label unique to their operation for this purpose. When you reach this level of shelf life control, you are in the "monkey" phase of my shelf life evolutionary ladder. This phase is the foundation of what is to come in your production. If I visit a company where this stage of evolution is the only method of shelf life control that they currently have in place, then I feel pretty confident that I will find at least one chemical on the floor or in use beyond its shelf life expiration date.

The next stage in the evolution of shelf life control is a method of tracking all chemicals affected by shelf life in a database that looks both forward and backwards in time. This tracking system should have the ability to alert the user of chemicals that are approaching the end of their shelf life or have already expired. This system is usually a spreadsheet or a calendar program on a computer with automatic alerts as to the shelf life expiration dates of all chemicals currently used in production. Most users of this system have an internal requirement that a designated person must review this database once a month to ensure that none of the automatic alerts are missed. I refer to this rung on the evolutionary ladder as the "Neanderthal" stage. This stage is a progression of the previous stage. Obviously you must have already identified all of your shelf life affected chemicals through labeling before you can evolve to this stage. If I visit a company that is currently at this stage of evolution, the odds of finding chemicals on the floor or in use beyond their shelf life expiration date have dropped dramatically.

This leads us to the final stage of evolution, "human". A company at this stage has labeled all of the shelf life affected chemicals in their inventory, created and is using a spreadsheet or calendar method to track and predict the number of chemicals that either have or will expire in a predetermined timeframe, and is aware of the location of these chemicals. This stage requires chemical traceability. This means that when a technician takes a chemical from the stores area, you record both the name of the technician that took the chemical and what chemical he took or you know the location of the chemical (i.e. "Rebuild Shop 2") after it is taken. This final stage of evolution allows the people responsible for shelf life control to not only know when a chemical will expire, but the location of that chemical for retrieval or disposal verification. When I visit a company with a "fully evolved" shelf life program very rarely do I find chemicals on the floor or in use beyond their shelf life expiration date. Keep in mind that no program is perfect because all programs depend on people who are not perfect. However, this level of shelf life control is very effective at ensuring regulatory compliance.

Announcement

See the official announcement and invitation on the C.A.S.E Website

C.A.S.E. Spring 2010 Conference

Sunday, April 18, 2010- Wednesday, April 21, 2010

Red Lion Hotel/Vancouver at the Quay
Vancouver, Washington
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