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December 11, 2012

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RE: Part Marking During Maintenance: Serial Numbers

Dear Steve:

The Aeronautical Repair Station Association (ARSA) has become aware of recent confusion over the marking of parts during maintenance. Unfortunately, this confusion has led to disputes between repair stations and their local Federal Aviation Administration (FAA) offices. The issue centers upon the addition of "serial number" information by a repair station during maintenance on parts received with missing or illegible markings.

Specifically, certain FAA offices are under the impression that a "serial number" is not among the additional markings that can be applied by a maintenance provider. Stated differently, the impression exists within the agency that a part can be marked with a part number or other identifying information by a repair station during maintenance, but the repair station cannot use a process to assign and mark a part with a "serial number" if the part was received without that information. We disagree.

Although we believe adequate FAA guidance exists on this topic, it has not resolved the issue. Therefore, ARSA respectfully asks for additional clarification from the FAA, as requested in this letter.

Basis and request

As the FAA has recognized, "[e]xcept for § 45.13(b) through (e),¹ there are no regulations (other than life-limited parts) requiring or prohibiting the remarking of an article received with a missing or illegible identification plate, label, tag, or other identifying marks."²

The FAA has also recognized that, "[e]xcept for § 45.13(b) through (e), there are no regulations (other than life-limited parts) requiring or prohibiting a person performing maintenance on the article from adding identification information."³

¹ All references are to Title 14 Code of Federal Regulations (14 CFR).

² FAA Order 8900.1, Vol.4, Ch.14, Sec.13, paragraph 4-1634(A)(2).

³ FAA Order 8900.1, Vol.4, Ch.14, Sec.13, paragraph 4-1634(A)(3).

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In short, there is no regulation that prohibits a repair station from adding a “serial number” to a part during maintenance when the part was received with that information missing or illegible.

That conclusion is fully supported by current FAA guidance; as stated in Advisory Circular (AC) 43-213, titled “Parts Marking Identification,” at paragraph 4(e):

Altering or Restoring Markings. Once a product is in service, maintenance providers routinely remove markings, data plates, etc. and replace them during maintenance and alteration in accordance with acceptable methods, techniques, and practices. Similarly, when markings are obliterated or illegible due to wear or other damage, the FAA permits the identification information to be restored where adequate records, inspections, or other information exists to verify the part’s authenticity. Such management and “restoration” of part markings is conducted under 14 CFR part 43 and other applicable regulations when returning an article to its “original or properly altered condition.” It is not a violation of the marking requirements of part 21 or 45, because the article is being “maintained” not “manufactured.” This has been the case historically even for critical parts subject to an AL [airworthiness limitation]. Maintaining continued airworthiness (when an article is maintained and/or altered, and subsequently returned to service) does not include the same regulatory marking requirements as the original manufacturing requirements (when an article must conform to the original design approval holder’s (DAH) approved design for a new product).

Again, we believe the current FAA guidance accurately reflects the ability of a repair station to add or restore markings during maintenance. However, for additional clarification we respectfully ask the FAA to provide an affirmative response to the following statement: A repair station can restore, or add, a “serial number” to a part received with missing or illegible serial number information, or to a part that was not originally “serialized.” In doing so, a repair station should follow its written procedures as suggested by AC 43-213, paragraph 6(c).

ARSA greatly appreciates, and looks forward to, the FAA’s response.

Sincerely,



Craig L. Fabian
Vice President Regulatory Affairs and
Assistant General Counsel