



U.S. Department
of Transportation
**Federal Aviation
Administration**

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Ms. Sarah MacLeod
Executive Director
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903

Dear Ms. MacLeod:

In reference to your letter on multiple part identification, the Aircraft Maintenance Division, Repair Station Branch has reviewed your request for information and provides the following responses:

Background: On October 19, 2011, the FAA received your letter requesting the issuance of guidance to address the identification of parts (with respect to maintenance records) received by repair stations with multiple part markings. In that letter, the Aeronautical Repair Station Association (ARSA) made several recommendations offering solutions to the issues, as noted on page 4 of your letter.

On December 2, 2011, the FAA responded to ARSA sharing the concerns identified in their October 19 letter. At that time, the FAA indicated they would review the policy and applicable guidance to clarify the requirements for maintaining parts and related recordkeeping for parts with dual or multiple identification numbers. On August 1, 2013, the FAA published a revision to FAA Order 8130.21H, "Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag". The revision contained several additional changes, but specifically addressed ARSA's recommendations as follows:

ARSA recommendation #1: If the part is marked with only the TC/PC part number, the section 43.9 record created by the repair station needs to reference only the TC/PC part number.

Response: FAA Order 8130-21 revision H, paragraph 3-1: "If the article is marked with the PC part number, the return to service will reference that number."

ARSA recommendation #2: If the part is marked with only the OEM PMA/TSOA number, the section 43.9 record created by the repair station needs to reference only the OEM PMA/TSOA number.

Response: FAA Order 8130-21 revision H, paragraph 3-1: “If the article is marked with a PMA and/or technical standard order authorization (TSOA) number, the return to service created will reference that number.”

ARSA recommendation #3: If the part is marked with more than one design and/or production approval holder number (TC/PC/PMA/TSOA), the repair station must carefully review the article and the customer’s request to determine how to identify the part.

Response: FAA Order 8130-21 revision H, paragraph 3-1: “If the article is marked with more than one PAH number (that is, PC, PMA, or TSOA), request guidance from the customer to determine which part number to use to support the customer’s work request.”

ARSA recommendation #3(a): If the customer is an air carrier (part 121 or 135) or commercial operator (part 125) or foreign air carrier with N-registered aircraft (section 129.14), the repair station should follow the customer’s direction as is required by section 145.205 and use the “originating” part in the appropriate block on the 8130-3 tag.

Response: FAA Order 8130-21 revision H paragraph 3-1: “If the customer is an air carrier (part 121 or part 135), commercial operator (part 125), or foreign air carrier with N-registered aircraft (14 CFR 129.14), follow the air carrier/operator’s maintenance programs.”

ARSA recommendation #3(b): If the customer holds another certificate that is allowed to perform maintenance under 14 CFR, i.e., part 65 mechanic or part 145 repair station, the receiving repair station should follow the customer’s direction and use the “originating” part in the appropriate block on the 8130-3 tag.

Response: FAA Order 8130-21 revision H paragraph 3-1: “Articles must be maintained using the instructions for the part number referenced in the customer’s work request.”

ARSA recommendation #3(c): If the customer does not hold a certificate under 14 CFR, the repair station must carefully review the article to determine if there is a method to ascertain the part number attached at production. Since that is unlikely, it can use either the TC/PC part number or the OEM PMA/TSOA part number in the appropriate block of the 8130-3. It can also put the “other” part number in block 13 if it wishes so that the “article” is fully identified as it actually exists (the part would actually match the “paperwork”).

Response: FAA Order 8130-21 revision H paragraph 3-1: “Articles must be maintained using the instructions for the part number referenced in the customer’s work request.”

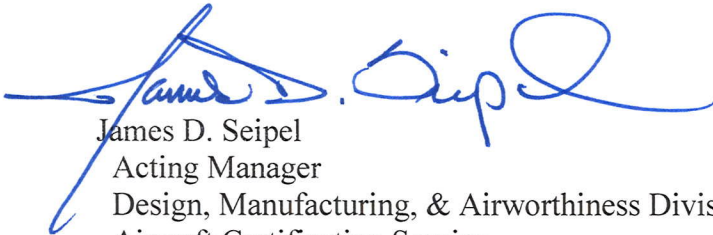
The FAA has taken ARSA’s recommendations into consideration, and has addressed the concerns identified in your letters dated October 19, 2011 and May 21, 2014, in the latest revision of FAA Order 8130-21H.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact the Aircraft Maintenance Division at (202) 385-6435 or the Aircraft Certification Service - Design, Manufacturing and Airworthiness Division at (202) 385-6348.

Sincerely,



Steven W. Douglas
Manager, Aircraft Maintenance Division



James D. Seipel
Acting Manager
Design, Manufacturing, & Airworthiness Division
Aircraft Certification Service