



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

Aviation Safety

800 Independence Avenue, SW.  
Washington, DC 20591

**RECEIVED**  
JUN - 1 2022

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

Mr. Bret Levanto  
Vice President of Operations  
Aeronautical Repair Station Association  
121 North Henry Street  
Alexandria, VA 22314

Dear Ms. MacLeod and Mr. Levanto:

Thank you for your May 3, 2022, follow-up letter to our April 22, 2022 letter requesting clarification as to whether ARSA Form E100 (Form E100) can be used as an acceptable means of compliance with Federal Aviation Administration (FAA) regulations, and the U.S. /EU Maintenance Annex Guidance (MAG), when inspecting new parts received without FAA Form 8130-3 (Form 8130-3) by an FAA Production Approval Holder (PAH).

The FAA has released several notices, memos, and letters addressing the scenario where parts were initially shipped domestically from a PAH without Form 8130-3. The FAA's Flight Standards Service, Aircraft Maintenance Division (AFS-300) issued a letter dated September 28, 2016, signed by then-division manager Tim Shaver, allowing the use of Form E100. We understand the letter did not include an expiration date. Mr. Shaver was consulted while researching this response and he stated his intent was for the letter to provide temporary relief for parts already on distributor shelves, and to expire when a revision to the U.S. /EU MAG was completed. The required information was updated in MAG revision 6. The MAG is now on revision 8.

The current language in MAG Paragraph 10.11.1.1 of Section B states: *For new components from a PAH, a release must be documented on Form 8130-3 as a new part.* MAG Paragraph 10.11.1.2 of Section B states: *For new components released by an EU POA, a release must be documented on an EASA Form 1, as a new part.*

Except for standard parts, there are no further exceptions from the requirement to having an authorized release certificate when a part is moving from one authority's jurisdiction to another's. This transfer occurs each time a part/component is released using Form 8130-3 with a dual release statement.

New articles exported to the European Union Aviation Safety Agency (EASA) system through a U.S. part 145 repair station with an EASA approval (dual certificated) must include Form 8130-3 to meet regulatory responsibility as described in the U.S. /EU Agreement, Annex 1, and paragraph 3.5. The Technical Implementation Procedures (TIP) for Annex 1 specifies that Form 8130-3 be used for this purpose.

Repair stations should request that a PAH or U.S. distributor issue Form 8130-3 for export

purposes via purchase order requirements (or similar) if that part is intended for installation on an EU-registered aircraft.

In conclusion, the requirement for traceability to a PAH for new parts being documented on Form 8130-3 is a TIP and MAG requirement. EASA has not accepted Form E100 as proof of traceability to a PAH for new parts, as required by the MAG and TIP for dual release. At this time, the FAA and EASA will not accept Form E100 as a means to meet the requirements for the release of new parts.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter or subject, please contact the Aircraft Maintenance Division, AFS-300, at (202) 267-1675.

If you or your staff needs further assistance, please contact the Office of Government and Industry Affairs, at (202) 267-3277.

Sincerely,

ROBERT C  
CARTY

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David H. Boulter  
Executive Director, Flight Standards Service