

**FAA Order 8120-15 - Performing Work on New Products or Articles that have
left the U.S. PAH/Supplier's Quality System
Frequently Asked Questions**

Why does the FAA define who is authorized to perform work on new products and/or articles that have left a Production Approval Holder's (PAH) quality system?

We define who is authorized to perform this work to clarify and standardize the applicability of part 21 and part 43 as they relate to new products or articles that have left a PAH's quality system.

What is meant by the phrase "perform work"?

From a part 21 perspective, "perform work" would entail any action performed on a new product or article while it is under the control of a part 21 quality system. Such actions might include Material Review Board, alignments, calibrations, inspections, etc., required to ensure that the product or article meets its original type design and is in a condition for safe operation. From a part 43 perspective, "perform work" would entail maintenance, preventive maintenance, inspection, overhauling, rebuilding, altering, or any other action called out in part 43.

At what point are products or articles considered to be complete?

Products or articles are considered to be complete once they have met all of the requirements of the approved type design and the quality system, an airworthiness determination is made, and they are released from the quality system.

When must new products or articles be maintained in accordance with part 43?

Once the products or articles leave the PAH's quality system, and are accepted by an airline, distributor, repair station, completion center, etc. Regardless of whether those products or articles have been installed on an aircraft having already met the applicability requirements of part 43, they are governed by the regulatory mandates of part 43.

Does this include completion centers that are performing installations of original equipment on aircraft that have not received an airworthiness certificate?

No. If an aircraft has not received an original airworthiness certificate, it is still in the part 21 environment. Therefore, products or articles that are being installed on these aircraft can have work performed under part 21. Exceptions would be used engines that are being installed on new aircraft. While used engines can be utilized, they must have been previously maintained in accordance with part 43.

What about products or articles that are being installed on in-service aircraft as part of a Supplemental Type Certificate (STC)?

During the type certification process, work performed on prototype products or articles is governed by part 21. Once the products or articles are installed on in-service aircraft, the work must be accomplished in accordance with part 43.

May a PAH perform work on new products or articles that have been released from their quality system and are accepted into another PAH's quality system for incorporation into their type design?

Yes. However, the work must be performed under the incorporating PAH's part 21 quality system. The exception to this requirement would be products or articles that are "returned to vendor".

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If a PAH controls the type design for its products or articles, why must work be performed under the incorporating PAH's quality system?

The PAH supplied **completed** products or articles. Those products and articles were accepted into another PAH's quality system for incorporation into their type design. Therefore, the incorporating PAH must control any work being performed.

Must the work still be performed under the incorporating PAH's quality system if the PAH is supplying products or articles with their own Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag?

The airworthiness approval tag indicates that the products or articles are complete at the time of issuance of the tag. If further work is required, it must be performed under the control of the incorporating PAH.

If a PAH ships incomplete products or articles to an incorporating PAH's facility without an Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag, and they have their own technicians located at that facility, may those technicians perform work on the products or articles under the provisions of their production approval?

Yes, they may if the facility is considered to be an extension of their production approval and is under the control of their quality system. The quality system must document how the products or articles will be final inspected. A Form 8130-3 is issued after all work is performed and the products or articles are complete.

If a PAH ships new products or articles to an airline, repair station, distributor, etc., and those items are not accepted for reasons such as wrong article ordered, too many articles shipped, etc., may the PAH restock them as new?

Yes, they may if their quality system controls how those products or articles are re-introduced into their PAH quality system. However, this Order does not address the processes associated with those activities.

If the product or article is accepted by the airline, repair station, distributor, etc., and is returned at a later date, may the PAH perform warranty work under the provisions of their production approval?

Yes- they may perform warranty work under the rebuild or alter provisions of 43.3(j).

Once the PAH performs warranty work, may a Form 8130-3 be issued for return to service, export, or domestic purposes?

Yes. Instructions for issuance of airworthiness approval tags are contained in Order 8130.21, Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag.

May used products or articles be installed on new production aircraft?

Yes. Instructions on the use of used products on new production aircraft are contained in Advisory Circular 21-19B, Installation of Used Aircraft Engines in New Production Aircraft.