



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

Advisory Circular

Subject: Control of Prepositioned Products and
Articles Shipped Prior to Design Approval

Date: 09/25/2025

AC No: 21-32C

Initiated By: AIR-600

1 **PURPOSE.**

This advisory circular (AC) provides the applicant with a means to control products and articles prepositioned prior to the issuance of a design approval (e.g., type certificate (TC), or supplemental type certificate (STC)).

Note: The term “type certificate” or “TC,” applied within this AC means the original TC, STCs, and amended TCs and STCs, unless otherwise specified.

2 **APPLICABILITY.**

- 2.1 The guidance provided in this AC applies to applicants of TCs, any licensee who has been granted the use of or access to TC holders’ design data, and production approval holders (PAHs), who produce products or articles that require to be shipped before the issuance of a design approval.
- 2.2 This is a guidance document. Its content is not legally binding in its own right and will not be relied upon by the Department as a separate basis for affirmative enforcement action or other administrative penalty. Conformity with the guidance document is voluntary only. Nonconformity will not affect rights and obligations under existing statutes and regulations. The FAA will consider other methods of demonstrating compliance that an applicant may elect to present. Terms such as “should,” “may,” and “must” are used only in the sense of ensuring applicability of this particular method of compliance when the acceptable method of compliance in this document is used. If the FAA becomes aware of circumstances in which following this AC would not result in compliance with the applicable regulations, we may require additional substantiation as the basis for finding compliance.
- 2.3 This material does not change, create any additional, authorize changes in, or permit deviations from existing regulatory requirements.

3 **WHERE YOU CAN FIND THIS AC.**

You can find this AC on the FAA's website at [Advisory Circulars](#) and the Dynamic Regulatory System (DRS) at [DRS](#).

4 **CANCELLATION.**

This AC cancels AC 21-32B, *Control of Products and Parts Shipped prior to Type Certificate Issuance*, dated August 10, 2010.

5 **RELATED READING MATERIALS.**

5.1 Title 14, Code of Federal Regulations

The full text of these regulations is available on the [National Archives Code of Federal Regulation](#) website.

- Part 21, *Certification Procedures for Products and Articles*.
- Part 45, *Identification and Registration Marking*.
- Section 21.53, *Statement of Conformity*.
- Section 21.130, *Statement of Conformity*.

5.2 FAA Forms.

The following forms are available on the [FAA Forms](#) website.

- Form 8130-3, *Authorized Release Certificate, Airworthiness Approval Tag*.
- Form 8130-9, *Statement of Conformity*.

5.3 FAA Memorandums.

The following FAA memorandums have been incorporated in this AC and will be cancelled after publication of this AC. They currently are available at [DRS](#).

- AIR100-16-110-DM12, *Deviation to FAA Order 8130.21 Regarding Prepositioned Products and Articles*, dated June 28, 2016.
- AIR100-16-110-PM05, *Shipment of Prototype Products and Articles with the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag*, dated June 28, 2016.

5.4 FAA Orders.

The following FAA orders are related to the guidance in this AC. If these orders are revised after publication of this AC, you should refer to the latest version for guidance available at [DRS](#).

- Order 8120.22, *Production Approval Procedures*.
- Order 8130.21, *Completion of FAA Form 8130-3 Under Part 21*.

BACKGROUND.

6 Aircraft, aircraft engine, and propeller manufacturers must often preposition completed
6.1 products or articles, before TC or STC issuance, to support their overall type certification programs and all production approval holders (PAHs) involved. This AC will facilitate TC or STC programs as it contains procedures to control the configuration of urgently needed products or articles shipped during the TC process. It will also inform industry how to ensure that FAA-approved articles are available for installation at the completion of the TC or STC program.

6.2 The term “prepositioned” is the practice of shipping conformed products and articles that are pending design approval, during type certification or supplemental type certification activities. These products and articles are identified as “prototype.”

Note: Regulatory Requirements. Title 14, Code of Federal Regulations (14 CFR) 21.53 requires applicants for type certification of aircraft engines and propellers to submit a statement of conformity to the FAA. A PAH or licensee of a TC or STC who manufactures a product or article under part 21 must submit a statement of conformity to the FAA. This establishes that each product and article conform to its type design and is in a condition for safe operation.

GENERAL INFORMATION.

7 The applicant or PAH should submit a written proposal to the appropriate FAA oversight office to request approval to preposition conformed product(s) or article(s) before TC or STC issuance. The certificate management (CM) section or Integrated Management Division (AIR-500) will review the proposal. This FAA review should verify the proposal is in line with the intent of the applicant’s quality system. At a minimum, the proposals should include:

7.1 Documented procedures detailing how the products or articles will be controlled and positively identified consistent with paragraphs 8 and 10 of this AC. The applicant should give the FAA sufficient time to evaluate the viability of the proposal and coordinate with any foreign Civil Aviation Authority (CAA) necessary. Bilateral agreements must be reviewed for export requirements and eligibility.

Note: The FAA may request that the CAA of the country or jurisdiction in which the product or articles will be located assist in conducting surveillance and inspections. Certain CAAs may charge a fee for services rendered. In this instance, the payment of CAA fees is the responsibility of the applicant. The CAA may prohibit certain FAA activities, including functions performed by FAA designees, at facilities operating within their regulatory system. Any CAA assistance is subject to written agreements between the FAA and the respective CAA.

- 7.2 Any planned use of FAA designees to conduct conformity inspections or make airworthiness determinations on behalf of the FAA. These functions would be performed on-site for each product or article being prepositioned. The use of FAA designees could be a factor in the FAA's acceptance of the proposal because the use of FAA designees at a location outside of the United States may alleviate an undue burden on the FAA.
- 7.3 Any design and quality data that may be required to conduct conformity inspections or make airworthiness determinations.
- 7.4 Procedures to control completed products and articles that are directly shipped from suppliers.

Note: Products or articles should not be prepositioned to any country whose authorities would prohibit the entry of FAA personnel into their country or inhibit FAA activities in any manner. The applicant should provide assurance of access to the FAA.

8 **AIRCRAFT ENGINES AND PROPELLERS (PRODUCTS).**

- 8.1 Prior to type certification, the applicant's proposal should contain, at a minimum, the following:
 - 8.1.1 Procedures to track products' configuration from the time of manufacture through the time of shipment and until the TC or STC is issued. Procedures should require the use of FAA Form 8130-9, to establish the status of the product by listing all deviations from the proposed type design.
 - 8.1.2 Estimated quantity of products to be shipped and the destination(s) (country, facility name, address, etc.).
 - 8.1.3 Reason why the products need to be shipped before TC or STC issuance.
 - 8.1.4 Approximate completion date of the TC or STC program and estimated total operational hours that each product will accumulate before TC or STC issuance.
 - 8.1.5 Method used to monitor products' operation and the entry of inspection and maintenance activities into the products records. The method should include instructions to record any operation that occurs in excess of the products' proposed operating limitations. This includes products used for static tests or flight tests that may have exceeded design limits.
 - 8.1.6 Method of clearly identifying the product with its airworthiness status e.g., "not for revenue service - flight test only" or "not for revenue service - type certificate pending."
 - 8.1.7 Method of monitoring the segregated storage and storage conditions of products at the destination facility.

- 8.1.8 Facility location where the applicant will demonstrate that the product conforms to its proposed design and is in a condition for safe operation. Facility location could be a factor in the FAA's approval of the proposal because a location outside the United States may create an undue burden on the FAA.
- 8.1.9 Procedures to update the product to its approved design and the approximate date this will occur.
- 8.1.10 Proposed use of any FAA designees to conduct a conformity inspection for the FAA.
- 8.2 After type certification, the applicant's proposal should contain, at a minimum, procedures for marking the aircraft engine data plate, propeller, propeller blade, or propeller hub with the TC or STC number, as appropriate. Depending on the individual program, the product may be considered produced under a TC or STC versus produced under a production certificate. The FAA will determine on a case-by-case basis the appropriate marking in accordance with 14 CFR part 45, *Identification and Registration Marking*.

Note: Products and articles that are pending certification are not eligible for installation on in-service or type certificated aircraft.

9 **AIRCRAFT PARTS, AIRCRAFT ENGINE PARTS, AND PROPELLER PARTS (ARTICLES).**

Prior to type certification, the applicant's proposal should contain, at a minimum, the following:

- 9.1 Procedures to track the configuration of the articles from the time of manufacture and shipment until the TC or STC is issued. The procedures should require the use of FAA Form 8130-9 to establish the status of the article by listing all deviations to the proposed type design.
- 9.2 Method of identifying and segregating the article shipped by the applicant or its suppliers with direct ship authority to prevent inadvertent installation on type certificated products before TC or STC issuance.
- 9.3 Method of monitoring the segregated storage and storage conditions of the articles at the destination facility.
- 9.4 Method of recalling and updating articles to the current configuration that do not meet the approved design at the time of TC or STC issuance. This method should ensure proper disposition of articles to preclude their installation in type certificated products unless they are updated to the current configuration.
- 9.5 Method of notifying facilities, where articles were shipped prior to TC or STC issuance, concerning the approval status of parts after TC or STC issuance.

10 **SUGGESTIONS FOR IMPROVEMENTS.**

If you have suggestions for improving this AC, you may use the Advisory Circular Feedback Form at the end of this AC.

DANIEL J.
ELGAS

Digitally signed by DANIEL J.
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Date: 2025.09.25 12:00:24 -04'00'

Daniel J. Elgas

Aviation Safety

Director, Policy and Standards Division, Aircraft Certification Service

Advisory Circular Feedback Form

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If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by (1) emailing this form to 9-AVS-AIR-Directives-Management-Officer@faa.gov or (2) faxing it to the attention of the LOB/SO (202) 267-1813.

Subject: AC 21-32C, *Control of Prepositioned Products and Articles Shipped Prior to Design Approval.*

Date: _____

Mark all appropriate line items:

☐ An error (procedural or typographical) has been noted in paragraph _____ on page _____.

☐ Recommend paragraph _____ on page _____ be changed as follows:

☐ In a future change to this AC, please cover the following subject:
(Briefly describe what you want added.)

☐ Other comments:

☐ I would like to discuss the above. Please contact me using the information below.

Submitted by: _____ Date: _____