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Counterfeit Control Plan for Electrical, Electronic and Electromechanical Parts

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Date:	Latest Revision Date
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Abstract:

This document describes the counterfeit control plan for electrical, electronic and electromechanical parts according to SAE AS6081.

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REVISION LOG

Issue	Date	Comment	Author
0-0			

DOCUMENT CHANGE RECORD

Issue	Item	Reason for Change

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1.0 Policy

The Company is committed to preventing the purchase, acceptance and distribution of fraudulent/counterfeit electrical, electronic and electromechanical parts. See Appendix 1 for process map.

2.0 Theory

The plan is intended to:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

3.0 Definitions

- Counterfeit Material - [REDACTED]
- Counterfeit Part - [REDACTED]
- Fraudulent Material - [REDACTED]
- Suspect Material - [REDACTED]

4.0 Applicable Documents

The following documents of the latest issue on the date of contract form a part of this plan to the extent specified herein.

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4.1 ANSI/ESD S20.20, Protection of Electrical and Electronic Parts, Assemblies and Equipment

4.2 EIA/IPC/JEDEC/J-STD-002, Solderability Tests for Component Leads, Terminations, Lugs, Terminals and Wires

4.3 EIA/IPC/JEDEC/J-STD-033, Handling, Packing, Shipping and Use of Moisture/Reflow Sensitive Surface Mount Devices

4.4 FAA Form 8120-11, Suspected Unapproved Parts Report

4.5 ISO/IEC 17025, General Requirements for the Competence of Testing and Calibration Laboratories

4.6 NAS-410, Certification and Qualification of Nondestructive Test Personnel

█ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]

4.10 SAE/ARP6178, Fraudulent/Counterfeit Electronic Parts; Tools for Risk Assessment of Distributors

4.11 SAE/AS6081, Fraudulent/Counterfeit Electronics Part: Avoidance Detection, Mitigation, and Disposition Distributors

5.0 Requirements

5.1 Customer Related Contract Review, Agreement and Execution

- The Company discloses to its Customers in writing at the time of each individual quotation the source of supply and their subsidiaries or affiliates by company name and location if the source [REDACTED]

[REDACTED] will negotiate an appropriate nondisclosure agreement with the Customer.

The Company:

- Issues a revised [REDACTED] whenever [REDACTED]
- Notifies Customers [REDACTED]

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- Provides a product [redacted] and [redacted] will replace [redacted]

5.2 Supplier Approval and Source Selection

When the Company quotes parts to the Customer as having been sourced from an Authorized Distributor, the Company requires [redacted]

[redacted] objective evidence that may include [redacted] or other form of evidence acceptable to the Customer.

The Company:

- Assesses potential sources of supply to determine [redacted]
- Maintains a register of [redacted] for product liability
- Precludes purchasing [redacted] of such parts
- Procures only [redacted] with Supply Chain Traceability when the parts are available from [redacted]

5.3 Purchase Order Requirements

The Company communicates and documents contract provisions from its Customer that establishes [redacted]

[redacted] requirements to manage risk. Purchase orders also define [redacted] supply or traceability [redacted]

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by the Customer and made [REDACTED] prior to shipping parts.

Purchase orders are prepared to require the Supplier to:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Provide test reports that contain:
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

5.4 Supply Chain Traceability

The Company requires an unbroken chain [REDACTED] that the material has not [REDACTED] for any reason.

Company records provide [REDACTED] for all procurement [REDACTED] to the direct source of the product for the Supplier.

- Supply chain traceability records are [REDACTED]

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- Traceability applies to [REDACTED]
- For each shipment, the Company provides [REDACTED]

5.5 Preservation of Product

The Company preserves the product during internal processing and delivery to the intended destination to maintain [REDACTED]

Preservation of product includes provisions for:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

ESD sensitive devices are handled according to *ANSI/ESD S20.20*. The Company verifies that electrostatic discharge control is [REDACTED]

Items are considered nonconforming if [REDACTED]
[REDACTED] part marking relevant to [REDACTED]

5.6 Verification of Purchased Product

Verification tasks may be discontinued [REDACTED] unless otherwise noted in the contractual agreement. The OCM may be contacted to [REDACTED]

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Parts risk mitigation by the Customer may include

[REDACTED]

Certificates of conformance and other documentation are examined for authenticity and applicability to the delivered material, including:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Parts received are subjected to the following processes:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

The Company verifies the authenticity of a purchased product according to:

- [REDACTED]

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[Redacted]

- [Redacted]
- [Redacted]

5.6.1 Lot Sampling Plan

A standard lot is [Redacted] received in a given shipment (procurement lot) at [Redacted]

A future shipment of devices of the same date code is considered [Redacted] followed by a suspect shipment of [Redacted]

A lot is also a quantity of [Redacted] while a lot from stores may [Redacted]

If parts are received in tape and reel and/or multiple packages, parts are [Redacted]

Test samples are selected at random according to sampling plan provided in *AS6081*; however, for lots with mixed date codes, the items are [Redacted] from the total population. [Redacted]

In the event the Company subcontracts inspections and tests to an independent third party test laboratory, the Company:

- [Redacted]
- [Redacted]

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5.7 Control of Nonconforming Product

The Company ensures products that do not conform to requirements are [REDACTED]

NOTE: The term “nonconforming product” includes [REDACTED]

The Company acts upon any reported information of nonconforming product with respect to [REDACTED]

[REDACTED] information according to Reporting requirements specified herein. Parties requiring notification of nonconforming product include [REDACTED]

Actions include [REDACTED]

When nonconforming product is corrected (e.g., [REDACTED]), it is subject to [REDACTED] Material Control specified herein.

5.8 Material Control

The Company:

- Controls nonconforming parts to [REDACTED]
- Controls suspect or confirmed fraudulent/counterfeit parts to [REDACTED]

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- Does not [REDACTED]

The Company controls suspect materials according to the following policies:

- The Company and Supplier establish [REDACTED]
- Notify the Supplier of [REDACTED] the following information:
 - Quantity to be returned
 - under which material was supplied
- [REDACTED]
- [REDACTED]
- Suspect counterfeit parts are not [REDACTED]

The Company mutilates scrap parts and materials to prevent their use. Mutilation is not limited to [REDACTED]

[REDACTED]

5.9 Returned Product

The following applies to product not found to be [REDACTED]

Parts are returned with:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

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- [Redacted]

Returns are not delivered [Redacted] include copies of the original paperwork.

5.10 Reporting

All occurrences of suspect, fraudulent and confirmed counterfeit parts are reported within [Redacted]

The Company supplies a summary report of all inspection and test results for each lot in advance of [Redacted]

Summary Report for Subcontracted Inspection and Test Results

The Company compiles all subcontracted inspection and test reports/data into [Redacted] structured as follows:

- [Redacted]
- [Redacted]

5.11 Personnel Training and Certification

Relevant personnel are trained (as appropriate to their function) in the avoidance, detection, mitigation and disposal of suspect, fraudulent and counterfeit parts. Additionally, all personnel involved with the direct handling of electronic parts are [Redacted]

Employees are trained to examine parts for:

- [Redacted]

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- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

5.12 Internal Audit

The Company conducts internal audits at planned intervals to determine whether the counterfeit control program:

- [Redacted]
- [Redacted]

An audit program is planned [Redacted] that takes into consideration [Redacted]

The selection of auditors and conduct of audits ensures [Redacted]

A documented procedure is established to define the responsibilities and requirements for planning and conducting audits, establishing records and reporting results. Records of audits and their results are maintained.

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The Responsible Authority for the area being audited ensures [REDACTED]
 [REDACTED] Follow-up activities
 include [REDACTED]

5.13 Risk Mitigation

The Company performs risk assessment of Suppliers according to *SAE ARP6178*
 to assess their capability to [REDACTED]
 [REDACTED]

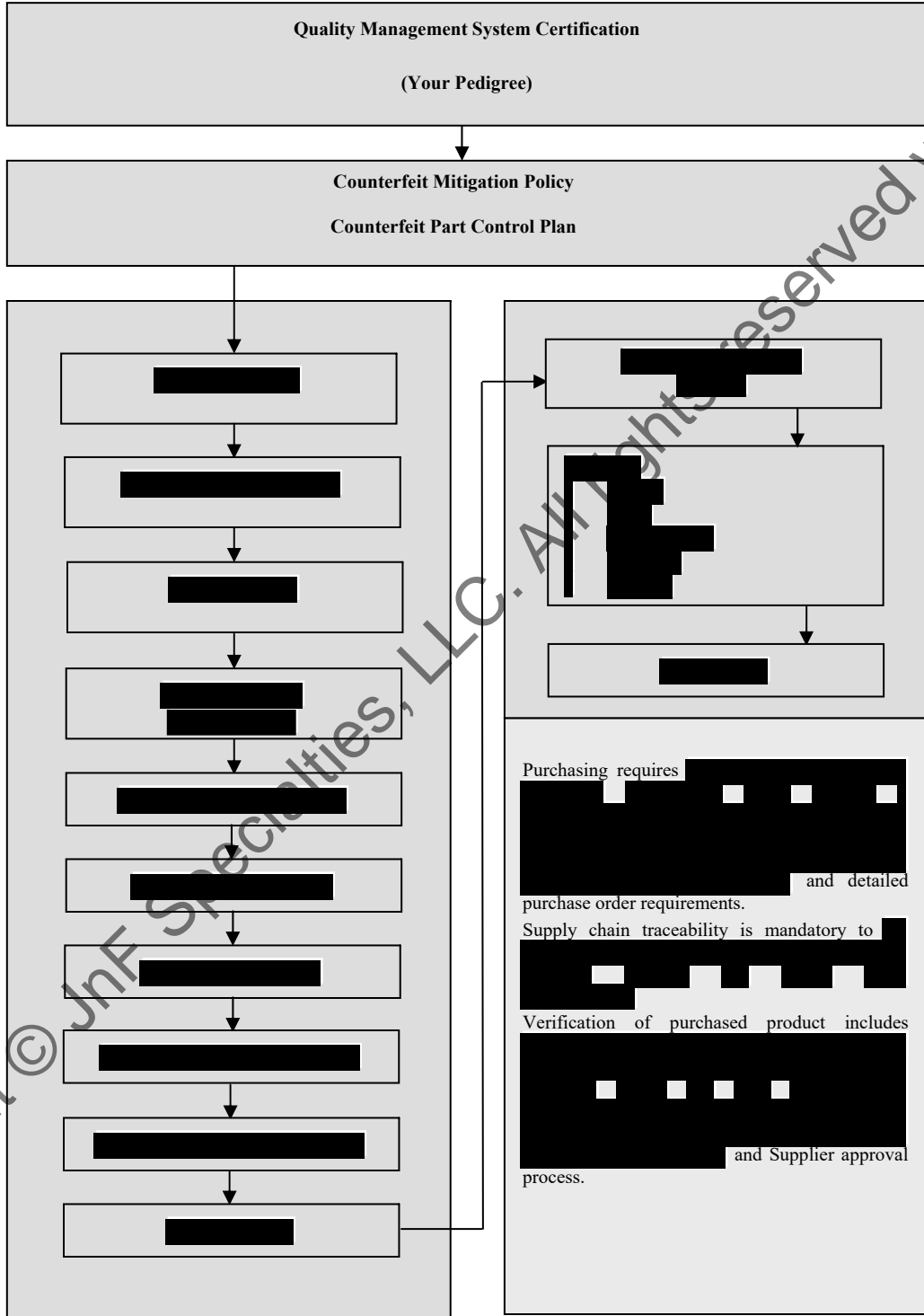
Supplier assessment includes:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

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Appendix 1: AS6081 Counterfeit Control Plan Process Map



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Risk Assessment Calculator

Supplier	1	2	3	4	5	Weight	1	2	3	4	5	1	2	3	4	5	Score	Total Rating	

Weight:

- 1 = Low Importance
- 5 = Very Important

Total Rating = multiply each Rating x Weight and sum in Score column then sum each Score in Total Rating

Select Supplier with lowest Total Rating

Consider disapproval of Supplier with highest Total Rating

Rating:

- 1 = Low Probability of Counterfeit Part
- 5 = High Probability of Counterfeit Part

Supplier Name: _____

Commodity: _____

Supplier is Approved if Part I criteria is met.

Part I

<input type="checkbox"/> [Redacted]	<input type="checkbox"/> [Redacted]
<input type="checkbox"/> [Redacted]	<input type="checkbox"/> [Redacted]

If Part I criteria is NOT met, Supplier must be evaluated under Part II.

Part II
Evaluator: check the boxes below for each criterion evaluated. Attach evidence where indicated.
At least three criteria must [Redacted]

<input type="checkbox"/>	[Redacted]
<input type="checkbox"/>	[Redacted]
<input type="checkbox"/>	[Redacted]
<input type="checkbox"/>	[Redacted]
<input type="checkbox"/>	[Redacted]
<input type="checkbox"/>	[Redacted]

Part III

<input type="checkbox"/>	[Redacted]
<input type="checkbox"/>	[Redacted]

RESULTS OF INITIAL EVALUATION AND SUPPLIER STATUS
(Ref. Counterfeit Control Plan)

<input type="checkbox"/> [Redacted]	<input type="checkbox"/> [Redacted]	<input type="checkbox"/> [Redacted]
-------------------------------------	-------------------------------------	-------------------------------------

Initial evaluation date: _____ Initial evaluation by: _____

RESULTS OF RECEIVING INSPECTION OR SERVICE FEEDBACK

Purchase Order Number Request for Support Number

<input type="checkbox"/> Supplier is [Redacted]	<input type="checkbox"/> Supplier [Redacted]
---	--

[Redacted]

NOTES

SUSPECT COUNTERFEIT PART REPORT

Counterfeit Calculated Risk Release

SUPPLIER NAME: _____

DATE RECEIVED: _____

SCPR#: _____ **SHEET** _____ **OF** _____

Routing Ticket#:		Op#:		Quantity Received:		Job Number:		
Item Name:								
Part#:								
Project Name:								
Send-to & Date:				Critical Impact to Schedule or Contract: <input type="checkbox"/> Yes <input type="checkbox"/> No				
Trend? <input type="checkbox"/> NO <input type="checkbox"/> YES <i>provide details:</i>								
CLASSIFICATION	Disposition - check all that apply							
MAJOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Approvals and Effectivity Verification

Review or Verify and Document Effectiveness of Action(s) Taken. Record source of objective evidence (training records, revised procedures):			
Originator Name – Date	Notify Customer – Date	Notify GIDEP – Date	Notify ERAI – Date
Notify FAA – Date	Notify Purchasing – Date	Notify Supplier – Date	Notify Manufacturer – Date

ACN=Advance Change Notice; ICAR=Investigation and Corrective Action Request; EO=Engineering Order