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Origination Date: XXXX

Document Identifier:	Counterfeit Control Plan for Electrical, Electronic and Electromechanical Parts
Date:	Latest Revision Date
Project:	Customer, Unique ID, Part Number
Document Status:	Draft, Redline, Released, Obsolete

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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:

Definitions 3.0

- Counterfeit Material -
- Counterfeit Part -
- Fraudulent Material -
- Suspect Material -

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
- EIA/IPC/JEDEC/J-STD-002, Solderability Tests for Component Leads nations, Lugs, Terminals and Wires 4.2 Terminations, Lugs, Terminals and Wires
- EIA/IPC/JEDEC/J-STD-033, Handling, Packing, Shipping and Use 4.3 Moisture/Reflow Sensitive Surface Mount Devices
- 4.4 FAA Form 8120-11, Suspected Unapproved Parts Report
- ISO/IEC 17025, General Requirements for the Competence of Testing and 4.5 Calibration Laboratories
- NAS-410, Certification and Qualification of Nondestructive Test Personnel 4.6



- 4.10 SAE/ARP6178, Fraudulent/Counterfeit Electronic Parts; Tools for Risk Assessment of Distributors
- Fraudulent/Counterfeit 4.11 SAE/AS6081, Avoidance Electronics Part: Detection, Mitigation, and Disposition Distributors

Requirements 5.0

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

will negotiate

an appropriate nondisclosure agreement with the Customer.

The Company:

Issues a revised

whenever

Notifies Customers

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Provides a product
 and
 replace

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

objective evidence that may include or other form

of evidence acceptable to the Customer.

The Company:

- Assesses potential sources of supply to determine
- Maintains a register of

for product liability

• Precludes purchasing

of such parts

with Supply Chain Traceability when the parts

• Procures only

are available from

5.3 Purchase Order Requirements

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

requirements to manage risk. Purchase orders

also define

supply or traceability

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by the Customer and made prior to shipping parts.

Purchase orders are prepared to require the Supplier to:

- •
- •
- •
- •
- •
- Provide test reports that contain:
 - •
 - •
 - •
 - •
 - •

5.4 Supply Chain Traceability

The Company requires an unbroken chain

that the material has not for any reason.

Company records provide

for all procurement

to the direct source of the product for the

Supplier.

• Supply chain traceability records are

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- Traceability applies to
- For each shipment, the Company provides

5.5 Preservation of Product

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

Preservation of product includes provisions for:

- •
- •
- •
- •

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

Items are considered nonconforming if

part marking relevant to

5.6 Verification of Purchased Product

Verification tasks may be discontinued

unless otherwise noted in the contractual

agreement. The OCM may be contacted to

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Parts risk mitigation by the Customer may include

Certificates of conformance and other documentation are examined for authenticity

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

Parts received are subjected to the following processes:

- •
- •
- •

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

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5.6.1 Lot Sampling Plan	
5.6.1 Lot Sampling Plan	
A standard lot is received in a given shipment (procurement lot) :	a f
received in a given simplificat (procurement lot)	aı
A future shipment of devices of the same date code is considered	
followed by	a
suspect shipment of	
A lot is also a quantity of	
while a lo	ot
from stores may	
If parts are received in tape and reel and/or multiple packages, parts are	
Test samples are selected at random according to sampling plan provided in	n
AS6081; however, for lots with mixed date codes, the items are	
from the total	al
population.	
In the event the Company subcentracts inspections and tests to an independent	a t
In the event the Company subcontracts inspections and tests to an independent hird party test laboratory, the Company:	11
and purely test incornacy, the company.	
•	

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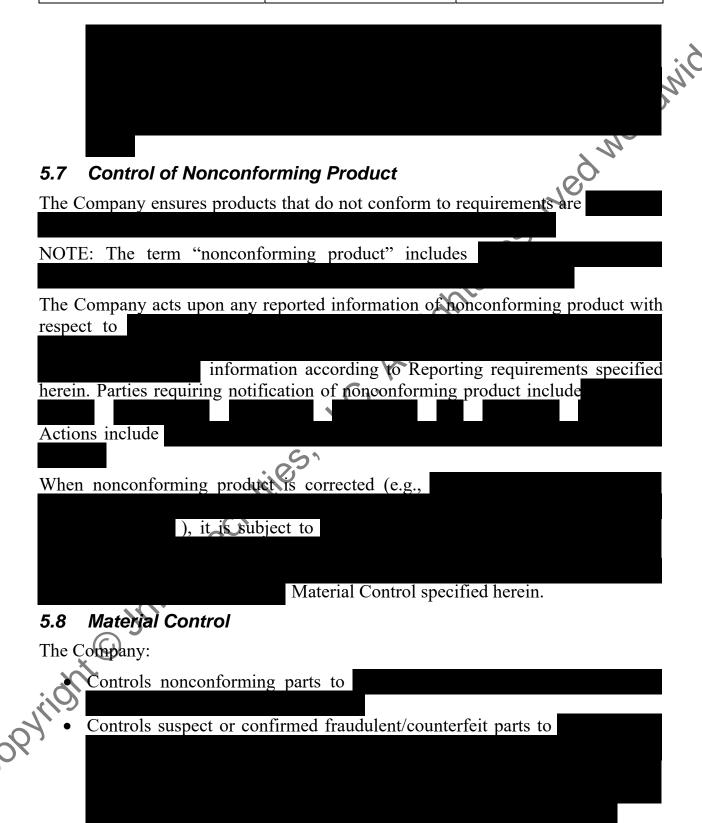
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The Company controls suspect materials according to the following policies:

• The Company and Supplier establish Does not

- Notify the Supplier of

the following information:

under which material was supplied

- -Quantity to be returned
- Suspect counterfeit parts are not

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

Returned Product 5.9

The following applies to product not found to be

Parts are returned with:

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Returns are not delivered

include copies of the original

paperwork.

5.10 Reporting

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

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

Summary Report for Subcontracted Inspection and Test Results

The Company compiles all subcontracted inspection and test reports/data into

structured as follows:

•

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

Employees are trained to examine parts for:

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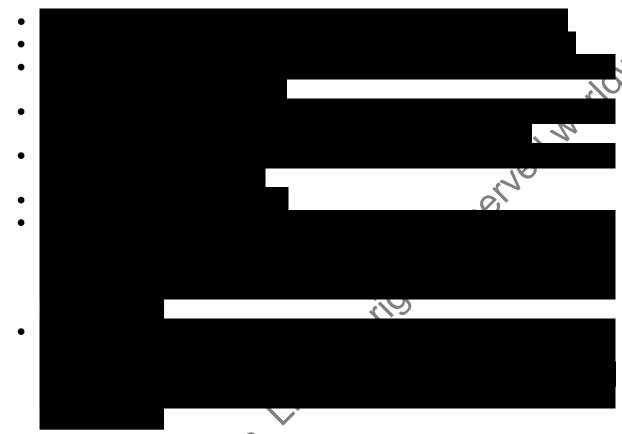
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5.12 Internal Audit

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

- •
- An audit program is planned that takes into consideration

The selection of auditors and conduct of audits ensures

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

Follow-up activities

include

5.13 Risk Mitigation

The Company performs risk assessment of Suppliers according to SAE ARP6178 to assess their capability to all rights reserve

Supplier assessment includes:

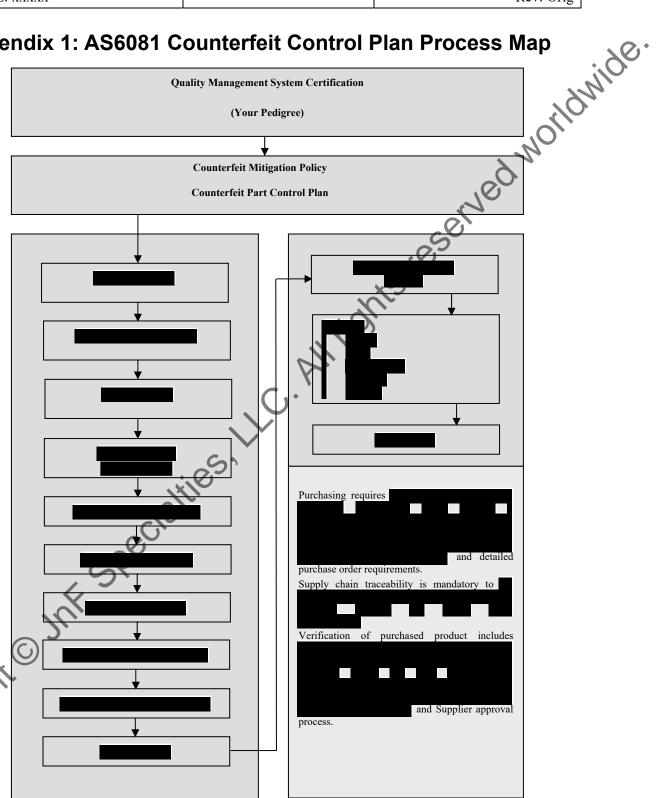
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Appendix 1: AS6081 Counterfeit Control Plan Process Map



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