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Counterfeit Control Plan for Electrical, Electronic and Electromechanical Parts

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

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:

- Assure authenticity and conformance of procured material, including methods such as certification, traceability, testing and inspection appropriate to the complexity of the item,
- Control material identified as fraudulent/counterfeit,
- Maximize availability of authentic material,
- Procure material from reliable sources,
- Report suspect or confirmed fraudulent material to other potential users and Authorities.

3.0 Definitions

- Counterfeit Material - Material that has been confirmed to be a copy, imitation or substitute that has been represented, identified or marked as genuine and/or altered without authority with intent to mislead, deceive or defraud.
- Counterfeit Part - Part made or altered to imitate or resemble an “approved part” without authority and is intended to mislead or defraud by passing as original or genuine.
- Fraudulent Material - Any suspect material misrepresented to the Customer as meeting the Customer’s requirements.
- Suspect Material - Any part with an indication that it may have been misrepresented by the Supplier or Manufacturer and may meet the definition of counterfeit material/part or fraudulent material.

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
4.7 QMS-12 Internal Auditing Procedure
4.8 QMS-13 Corrective and Preventive Action Procedure
4.9 QMS-14 Control of Nonconformances Procedure
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 is or is not authorized (franchised) for the item(s) being quoted and is or is not providing full manufacturer's warranty on the quoted material. If the Company considers the name of the source of supply as proprietary, the Company will negotiate an appropriate nondisclosure agreement with the Customer.

The Company:

- Issues a revised written quotation to the Customer whenever the source of supply changes,
- Notifies Customers within 5 days if commitments cannot be satisfied,
- Provides a product warranty for a minimum of one (1) year stating that the product is reliable and free from known defects and that the Company will replace defective parts or refund original cost of product.

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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 Suppliers to disclose at the time of each individual quotation, objective evidence (either proof from the OCM website or letter from the OCM) that the Supplier is authorized (franchised) for the item(s) being quoted and is or is not providing full manufacturer's warranty on the quoted material. This disclosure is based on objective evidence that may include [redacted]

The Company:

- Assesses potential sources of supply to determine [redacted]
- Maintains a register of approved Suppliers and status based upon historical experience that includes [redacted]
- Precludes purchasing from sources of supply that have repeatedly failed to detect and avoid fraudulent/counterfeit parts or otherwise failed to exercise due diligence in the detection and avoidance of such parts,
- Procures only new and authentic parts directly from OCM or Authorized Suppliers or from Suppliers that obtain such parts exclusively from the OCM or their Authorized Suppliers with Supply Chain Traceability when [redacted]

5.3 Purchase Order Requirements

The Company communicates and documents contract provisions from its Customer that establishes controls for fraudulent/counterfeit part avoidance on all purchase orders placed with its Suppliers. Purchase orders include [redacted]

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Purchase orders are prepared to require the Supplier to:

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

5.4 Supply Chain Traceability

The Company requires an unbroken chain of documentation (certifications, packing slips, etc.) tracing the movement of the purchased material back through the supply chain to its origin and certification that the material has [redacted]

Company records provide traceability to the OCM, Aftermarket Manufacturer or their Authorized Distributor(s) that identify the name and location of all supply chain intermediaries for all procurement lots and the date of all intermediate purchases from the part manufacturer to the direct source of the product for the Supplier.

- Supply chain traceability records are [redacted]
- Traceability applies to [redacted]

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- For each shipment, the Company provides copies of the original manufacturer's or their Authorized Distributor's certificate of conformity or certificate of traceability with [redacted]

5.5 Preservation of Product

The Company preserves the product during internal processing and delivery to the intended destination to maintain conformity to requirements. Preservation includes [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 adequate if the humidity in ESD controlled area(s) drops to [redacted]

Items are considered nonconforming if there is any reason to believe that moisture sensitive protection was compromised. Moisture sensitive components are handled according to ***IPC/JEDEC J-STD-033*** or Customer requirements. In addition, applicable OCM package labeling or part marking relevant to supply chain traceability are [redacted]

5.6 Verification of Purchased Product

Verification tasks may be discontinued at any point where failures or indication of fraudulent/counterfeit parts are found unless otherwise noted in the contractual agreement. The OCM may be contacted to assist in authenticating product in conjunction with conducting verification testing.

Parts risk mitigation by the Customer may include the full suite of required and additional tests of ***AS6081 Table 1***. In addition, OCM input may be required to

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draw full conclusion of the test results. Product failing verification inspection/testing is controlled according to Control of Nonconforming Product specified herein.

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

- [redacted]

Parts received are subjected to the following processes:

- [redacted]

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

- [redacted]

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- [redacted]
- [redacted]

5.6.1 Lot Sampling Plan

A standard lot is a homogeneous lot and is defined in this sampling plan as [redacted]

A future shipment of devices of the same date code is considered a new lot, which will prevent a shipment of good devices being accepted and being followed by a suspect shipment of devices of the same date code being accepted without inspection.

A lot is also a quantity of devices removed from storage and submitted for inspection. Generally, a procurement lot is [redacted]

If parts are received in tape and reel and/or multiple packages, parts are randomly pulled from the entire length of the reel and from multiple reels and/or packages. The same samples can be used for multiple test steps.

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

5.7 Control of Nonconforming Product

The Company ensures products that do not conform to requirements are identified, segregated and controlled to prevent their unintended use or delivery.

NOTE: The term "nonconforming product" includes nonconforming product returned by a Customer and fraudulent, counterfeit and/or suspect parts.

The Company acts upon any reported information of nonconforming product with respect to product previously shipped or not yet shipped. If the assessment indicates that suspect, fraudulent or confirmed counterfeit product was shipped, the Company [redacted]

When nonconforming product is corrected (e.g., delivery of incorrect quantity versus the quantity ordered, shipping product that is not in packaging specified by the Customer, etc.), it is subject to re-verification to demonstrate conformity to requirements. Records of the nature of nonconformities are [redacted]

5.8 Material Control

The Company:

- [redacted]
- [redacted]
- [redacted]

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[redacted]

The Company controls suspect materials according to the following policies:

- [redacted]
- Notify the Supplier of findings and provide the Supplier an opportunity to verify findings and provide the following information:
  - [redacted]
- [redacted]
- [redacted]
- [redacted]

The Company mutilates scrap parts and materials to prevent their use. Mutilation is not limited to [redacted] For more details, see ***QMS-14 Control of Nonconforming Product Procedure*** and ***QMS-13 Corrective and Preventive Action Procedure***.

5.9 Returned Product

The following applies to product not found to be suspect, counterfeit or fraudulent. The Company ensures product substitution has not occurred in the return process.

Parts are returned with:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

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- [redacted]

Returns are not delivered to Suppliers without return material authorization (RMA). After receipt of RMA, returned parts include [redacted]

5.10 Reporting

All occurrences of suspect, fraudulent and confirmed counterfeit parts are reported within 60 days of identification to applicable internal departments, Customers, ***GIDEP***, ***ERAI*** and when applicable, the Federal Aviation Administration (FAA) using ***FAA Form 8120-11, Suspected Unapproved Parts Report.***

The Company supplies a summary report of all inspection and test results for each lot in advance of product shipment or with each shipment of product as specified by the Customer when [redacted]

Summary Report for Subcontracted Inspection and Test Results

The Company compiles all subcontracted inspection and test reports/data into a single consolidated report/data package. The consolidated report/data package is 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]

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 according to ***QMS-12 Internal Auditing*** 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]

5.13 Risk Mitigation

The Company performs risk assessment of Suppliers according to ***SAE ARP6178*** to assess their capability to prevent, detect, contain and report suspect or confirmed counterfeit electronic components.

Supplier assessment includes:

- [redacted]

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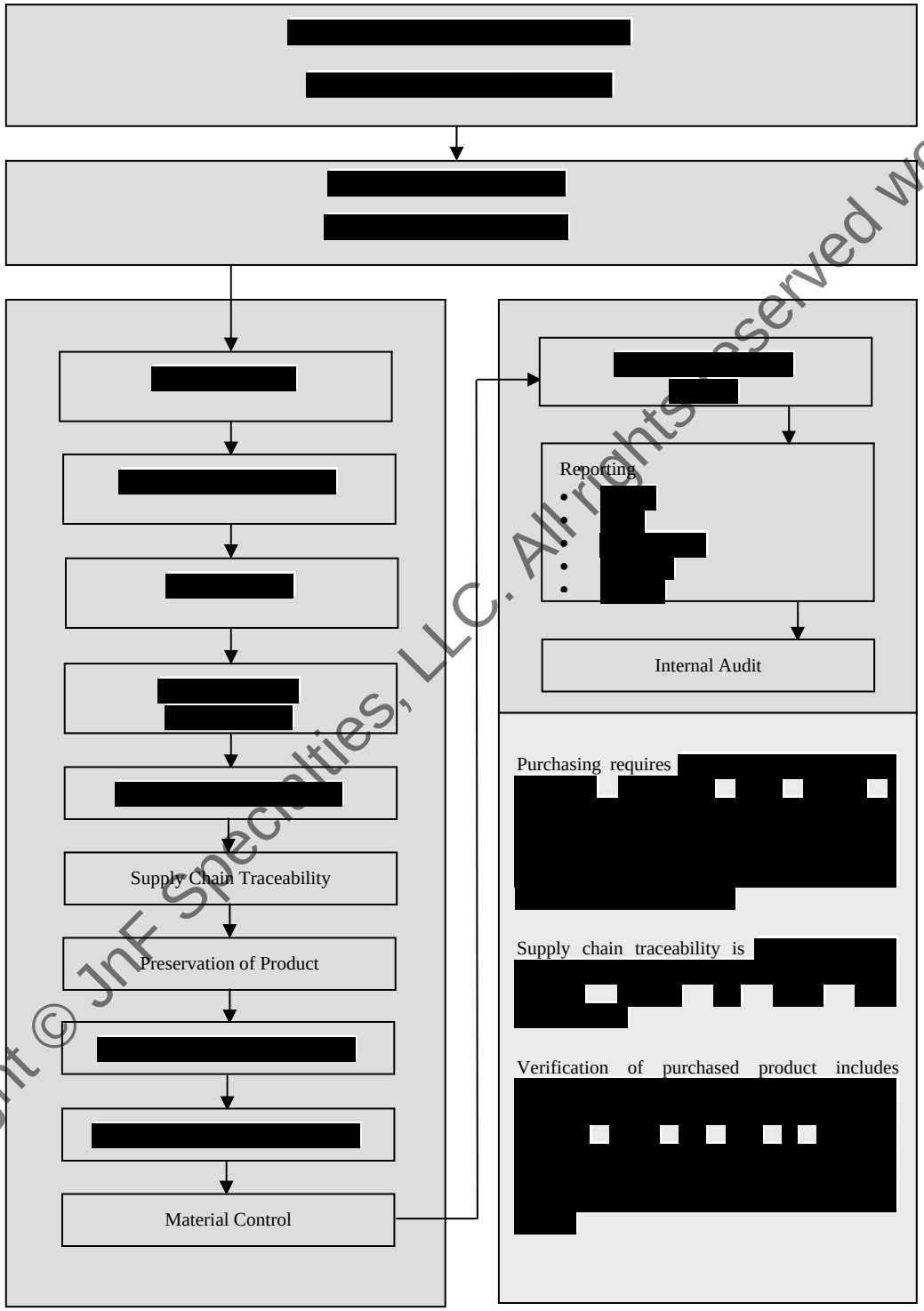
Appendix 1: AS6081 Counterfeit Control Plan Process Map



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Your Logo **Supplier Evaluation and Status**

Supplier Name: **Commodity:**

Supplier is Approved if Part I criteria is met.

Part I

☐ [redacted] ☐ [redacted]

☐ [redacted] ☐ [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 be checked in Part II for the Supplier to be qualified.

☐ [redacted]

RESULTS OF INITIAL EVALUATION AND SUPPLIER STATUS

(Ref. Counterfeit Control Plan)

☐ [redacted] ☐ [redacted] ☐ [redacted]

[redacted] ____ [redacted] ____

RESULTS OF RECEIVING INSPECTION OR SERVICE FEEDBACK

Purchase Order Number **Request for Support Number**

☐ [redacted] ☐ [redacted]

[redacted]

NOTES

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Form Rev: Orig

SUSPECT COUNTERFEIT PART REPORT

☐**Counterfeit** ☐**Continuous Improvement Opportunity** ☐**Calculated Risk Release**

SUPPLIER NAME: _____ DATE RECEIVED: _____

SCPR#: SHEET _____ OF _____

Routing Ticket#:		Op#:		Quantity Received:		Job Number:	
Item Name:							
Part#:							

Trend? ☐NO ☐ YES *provide details:*

Approvals and Effectivity Verification

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PLAN - STEP ONE: Audit Preparation & Planning

Process to Audit (Audit Scope): Counterfeit Control Plan	
Audit Date(s):	Lead Auditor:
[redacted]	[redacted]
[redacted]	
[redacted]	
[redacted]	

[redacted]	
[redacted]	[redacted]

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DO - STEP TWO: Compare Documentation vs. Requirements

[redacted]		
[redacted]		
[redacted]		
[redacted]		
[redacted]		

[redacted]

CHECK - STEP THREE: Compare Actual Practice vs. Requirements

[redacted]			

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[redacted]			
[redacted]	[redacted]	[redacted]	[redacted]

[redacted]			
[redacted]	[redacted]	[redacted]	[redacted]

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ACT - STEP FOUR: Verify the Effectiveness of the Process

[redacted]

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STEP FIVE: Summarize Your Findings for Nonconformance System

NONCONFORMITIES	
[redacted]	[redacted]
[redacted]	
[redacted]	
[redacted]	
[redacted]	

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OPPORTUNITIES FOR IMPROVEMENT	
[redacted]	
[redacted]	
[redacted]	
[redacted]	

STEP SIX: Review Audit Report and Submit

All auditors on the audit team must [redacted]

Signature of Lead Auditor

Audit report reviewed and ready for submission:

Date

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STEP SEVEN: Submit Audit Report to Appropriate Managers

The completed audit report must be submitted to the managers responsible for the areas audited, as well as any other appropriate persons.

Audit report sent to:

☐ Quality Manager (for logging)	☐ Manager	☐ Manager
☐ Manager	☐ Manager	☐ Manager
☐ Manager	☐ Manager	☐ Manager
☐ Manager	☐ Manager	☐ Manager
☐ Other:		

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NOTES PAGE

Your Note reference #	Notes, evidence, findings, comments, etc.

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CONSOLIDATED REPORT DATA PACKAGE

(mo/yr)

Revisions		Rev:	Orig
Letter	E.O. Number - Description	Date	

Used On	Contract#:		**Your Co Name**				
Prepared By:							
RA:							
Quality:			**CONSOLIDATED REPORT DATA PACKAGE**				
			Your Number				
			Size:	**A**	CAGE:		Form Rev: Orig 1 of 12

Your Co Logo

CONSOLIDATED REPORT DATA PACKAGE.

ITEM NAME:	
P/N AND REVISION:	
CUSTOMER P/N AND REVISION:	
PO# AND REVISION:	
SPECIFICATION# AND REVISION:	
QUANTITY:	

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CONSOLIDATED REPORT DATA PACKAGE.

PURPOSE

This consolidated report data package is a collection of inspection and test results for suspect counterfeit parts.

PO No.:

PURCHASE ORDER ATTACHED

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SUMMARY

The following items, as applicable, are included in this data package for permanent storage:

ITEM DESCRIPTION	INCLUDED	EXCLUDED	QA
Project Documents			
[redacted]			

NOTE:
Records are proprietary if they give-away trade secrets or infringe on the exclusive rights of the Company or Manufacturer.

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CUSTOMER CONTRACT AND CHANGE DOCUMENTS THAT AFFECT THE CONTRACT

Amendments to the Contract must be attached to this document, e.g., [redacted]

CONTRACT CHANGE LIST

[redacted]	[redacted]	[redacted]

APPROVED ENGINEERING CHANGE LIST

[redacted]	[redacted]	[redacted]

DEVIATION/WAIVER LIST

[redacted]	[redacted]	[redacted]

SUSPECT COUNTERFEIT PART REPORT

[redacted]	[redacted]

ATTACHED

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CONFIGURATION DEFINITION

[redacted]

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SERIALIZATION LIST

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MEASUREMENT EQUIPMENT

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QA NOTES, MEETING MINUTES, etc.

[redacted]

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MINIMUM TEST AND INSPECTIONS

[redacted]

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ADDITIONAL TESTS (when applicable)

[redacted]

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OTHER INSPECTIONS/TESTS (when applicable)

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