



Examining 8130-3 Tags

People often joke that the paperwork is more important than the part. While this is obvious hyperbole, the importance of documentation as evidence of airworthiness has steadily increased over the past 30 years. A corollary to the important role that documentation plays, today, is the importance of understanding what is — and what is not — acceptable in the documentation. A key element of this is understanding the FAA's Form 8130-3.

One of the issues we've seen is 8130-3 tags that are not appropriate to the underlying component. One of the most obvious examples of this is Airbus parts with FAA Form 8130-3 tags.

Left Side Signature

Generally speaking, the FAA only permits 8130-3 tags to be issued as airworthiness approvals for new parts that were produced under an FAA production approval. A Boeing aircraft, for example, is typically produced under the Boeing's FAA-issued production certificate, and the replacement parts that Boeing produces for that same aircraft are also subject to the FAA production approval. Because the components are produced under an FAA production approval, the production approval holder is authorized to issue 8130-3 tags for those new components.

When the production approval holder issues an 8130-3 tag for a new replacement part, it is typically signing the 8130-3 tag on the left side. This signifies that the part is in an airworthy condition at the time of the signature. The production approval holder is typically able to rely on its own production quality assurance system to ensure this current airworthy condition at the time of release from the manufacturer's production quality assurance system.

Airbus typically produces its aircraft and replacement parts under its European production organization authorization (POA). This is different from the FAA production certificate. Airbus is authorized to issue EASA Form 1 (the European form), but it is not authorized to issue 8130-3 tags for new parts.

We often hear about requests for 8130-3 tags on Airbus parts (or other foreign-produced parts) that are directed to FAA designees. FAA designees who receive this sort of request should first inquire whether there

is any FAA production approval associated with the component in question.

- If the answer is "yes," then the FAA-designee should rely on the FAA production approval as the basis for considering whether to issue an 8130-3 tag to document the airworthiness of the component (more on this, later);
- If the answer is "no," then the component is likely ineligible for an airworthiness approval that is issued on an 8130-3 tag.

Is there ever a circumstance where a part for an Airbus aircraft could be accompanied by an 8130-3 tag? Yes: if the part was produced under a U.S. FAA production approval. Two main examples of this would be parts produced under an FAA PMA and parts produced under an FAA TSOA. Both FAA-PMA and FAA-TSOA are FAA production approvals.

The first of these categories — parts produced under an FAA PMA — could be replacement parts produced for installation on an Airbus aircraft. The PMA company might be fully independent of Airbus, or it might be a supplier to Airbus that sought PMA in order to be able to support the aftermarket. Either way, to the extent the PMA parts are produced under FAA production approval, they are eligible for an 8130-3 tag issued by the production approval holder, as well as a subsequent tag issued by an FAA employee or designee who is able to confirm the conformity to approved design and current airworthiness of the article.

Similarly, a component produced under an FAA TSOA could also be intended for installation on an Airbus aircraft. Such a part would be eligible for an 8130-3 airworthiness approval because it was produced under an FAA production approval, and conformed to the parameters of the approved design.

In each case — FAA PMA or FAA TSOA — an 8130-3 might be issued by either the manufacturer (under 14 CFR 21.137(o)) or by an FAA employee or designee who confirms that the component was produced under an FAA production approval, and that the component has not suffered damage nor degradation that would cause it to no longer meet the design parameters.

An Example

Imagine that a manufacturer in the United States

("Partsko") produces widgets for Airbus. The manufacturer produces the widgets solely for Airbus, for installation on their aircraft, and produces them for no other customer. These parts are produced (solely) under the Airbus POA. Such parts are not eligible for an 8130-3 but Airbus may be able to issue an EASA Form 1 (the European form) for the parts when they are released from the Airbus production quality assurance system.

Now imagine that Partsko decides to obtain parts manufacturer approval, or "FAA-PMA," from the FAA. They can do it by submitting their own data to demonstrate compliance to the FAA regulations, or they can apply under PMA assist letter from Airbus that allows them to obtain a PMA by licensing agreement. It is not uncommon for a component manufacturer to design an article that is installed in an aircraft or engine, transfer the intellectual property to the type certificate holder for the aircraft or engine, and then as part of the supply contract, the type certificate holder licenses the recently transferred intellectual property back to the supplier (Partsko). The data will have been approved in the context of the type certificate. When that approved data is licensed to Partsko, then Partsko is able to identify it as already-approved data and take a short-cut

to FAA-PMA by applying under a licensing agreement from the type certificate holder. Once the FAA issues the FAA-PMA to Partsko, then Partsko is eligible to issue 8130-3 tags for new parts that are released from the production quality assurance system. While it would be legal for the Partsko 8130-3 tag to remain on the part while it is shipped to a final destination, Airbus has no independent power to issue an 8130-3 tag for that same component (but, again, Airbus may be able to issue an EASA Form 1 for the component when it is released from Airbus' own European production organization authorization (POA) system).

Right Side Signature

Don't get confused by the FAA form 8130-3 tag when it is used as an approval for return to service (right side signature). The signature rights for this usage are derived from the maintenance regulations in 14 C.F.R. Part 43.

An FAA-approved repair station could inspect or overhaul an Airbus component and then document the work with an FAA Form 8130-3. In this situation the 8130-3 tag is used as an approval for return to service. (You can distinguish this usage visually because the form is signed on the right side, and not on the left side.) **AM**

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