



**AS9100b Quality System Manual and
Procedures**

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Dated

4-6-2010

Global Aviation Technologies LLC Quality Manual and Procedures Revision Notes

Revision Level	Change Description	Date
IR	Original Release	03-16-2007
Rev A	<ul style="list-style-type: none"> -Updated Section 7.4.1 to include more detail on vendor selection and information regarding “one-time” vendors -Added “or authorized designee” to last sentence on page 19 -Added “as applicable” reference to section 7.4.3 -Updated first paragraph of Section 8.2.2 to note frequency of internal audits as stated in Global Aviation Technologies Fabrication Inspection Manual 	07-03-2007
Rev B	<p>Updates per results of Stage I audit with SAI Global and other small corrections:</p> <ul style="list-style-type: none"> -Inserted Design and Development on flowcharts (inadvertently overlooked) -Section 7.4.1, paragraph 3, removed reference to refer to GAT FIS Manual. -Section 7.4.2 “specimen” changed to “article” and the word ‘adequacy’ in the last sentence corrected to accuracy. -Section 7.4.3, changed verbiage in third paragraph to match first for consistency. -Section 7.5.2 deleted in its entirety due to no “Special Processes” by definition at this time. -Section 8.2.2, Revised first sentence and added “Initially, this will be conducted annually.” -Section 8.5.2, Added a statement regarding Quality Management reviewing authority. Section 8.5.3, Added a statement regarding Management reviewing authority (similar to 8.5.2). -All references to “supplier” throughout entire document changed to “vendor” for consistency. 	08-07-2007
Rev C	<p>Updated to reflect results of Stage II AS9100 registration audit:</p> <ul style="list-style-type: none"> -Section 7.4.1, eliminate contradictory statement regarding frequency of all FAA approved vendors. -Section 7.5.1.2, clarified authorized designee’s other than Engineering. -Section 7.5.2, section re-added in its entirety. -Section 8.2.2, adjusted 1st paragraph to accommodate more frequent audits which may be conducted. -Section 8.3, added clarification regarding conditions where UAI and Repair will be allowed. Also provided clarity on criteria for MRB membership. 	09-10-2007

Revision Level	Change Description	Date
D	<ol style="list-style-type: none"> 1. Section 4.2.3 <ol style="list-style-type: none"> a. 4th sentence revised for clarification 2. Section 5.4.1 <ol style="list-style-type: none"> a. Quality objectives revised due to management review meeting results. 3. Section 7.4.1 <ol style="list-style-type: none"> a. Sentence added to second paragraph regarding monitoring requirements of supplier not required to be on AVL 4. Section 8.3 <ol style="list-style-type: none"> a. Rework added to list of potential dispositions 5. Section 7.5.2 <ol style="list-style-type: none"> a. Update Process Specs list to include Potting Procedures. b. Removed PS number for Crimping. 	06-19-2009
E	<p>Amended to comply with 14 CFR part 21</p> <ol style="list-style-type: none"> 1. -Section 4.3 Removed reference to GAT FIS manual. 2. -Section 5.5.1 Removed reference to GAT FIS manual 3. -Section 7.3 Removed reference to GAT FIS manual 4. -Section 7.3.7 Removed reference to GAT FIS manual <ol style="list-style-type: none"> a. Added a statement regarding design change approvals 5. -Section 7.4.3 Removed reference to GAT FIS manual 6. -Section 7.5.1.1 Added " SNAG Log " in paragraph a 7. -Section 7.5.2 Removed reference to GAT FIS manual 8. -Section 7.5.3 Removed reference to GAT FIS manual <ol style="list-style-type: none"> a. Added a statement regarding material storage And issuance 9.- Section 7.5.5 Removed reference to GAT FIS manual 10.- Section 7.6 Removed reference to GAT FIS manual 11.- Section 8.2.2 Removed reference to GAT FIS manual 12.- Section 8.2.4 Removed reference to GAT FIS manual 13.- Section 8.2.4.1 Removed reference to GAT FIS manual 14- Section 8.3 Removed reference to GAT FIS manual 15. – Added header to chart on page 13. 	4-6-2010

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4. QUALITY MANAGEMENT SYSTEM

4.1 General Requirements

Global Aviation Technologies has established, documented, implemented and maintains a quality management system and strives to continually improve the quality systems effectiveness in accordance with the requirements of ISO9001:2000 and AS9100b.

Global Aviation Technologies has identified the processes needed for the quality management system and the application of needed processes throughout the organization. Flowcharts have been prepared to show the sequence and interaction of these processes. Global Aviation Technologies has determined methods to be used for operation and control of these processes and has determined the criteria needed for control.

Top management uses input from personnel, quality results, and management review to ensure the availability of appropriate resources and information necessary to support the operation and monitoring of these processes.

Processes are monitored, measured and analyzed to provide a baseline for data and metrics for continual improvement. Flowcharts are found on the pages following.

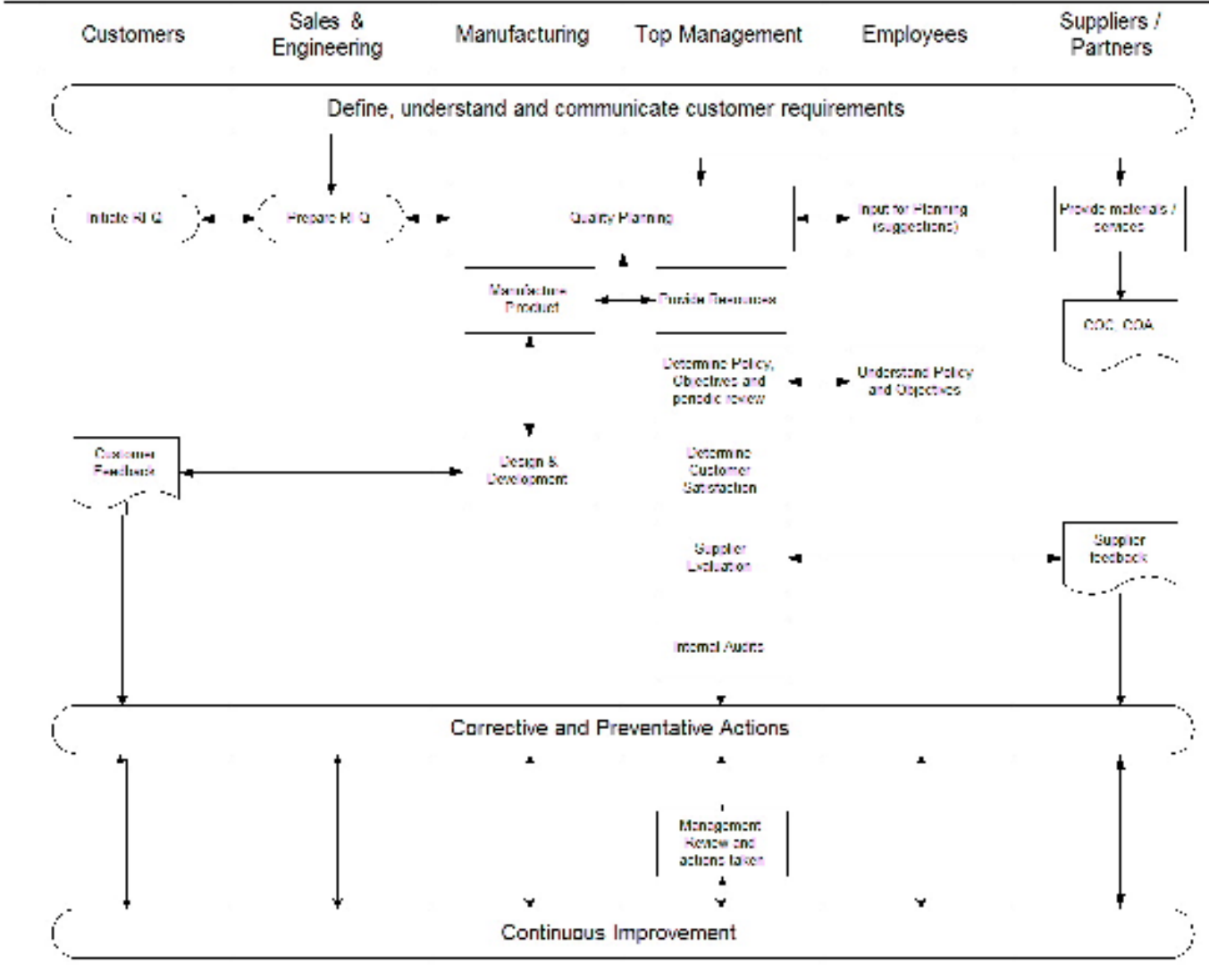
The scope of this quality management system covers the manufacture and repair of aircraft electrical subassemblies and wire harnesses. Global Aviation Technologies also provides assembly. Global Aviation Technologies is a FAA PAH (Parts Approval Holder).

This manual has been developed to administer procedures for the control of quality and continuous improvement efforts to ensure customer satisfaction for our products and services. The Quality Management System requirements specified in this manual are complementary (not alternative) to contractual and the applicable law and regulatory requirements.

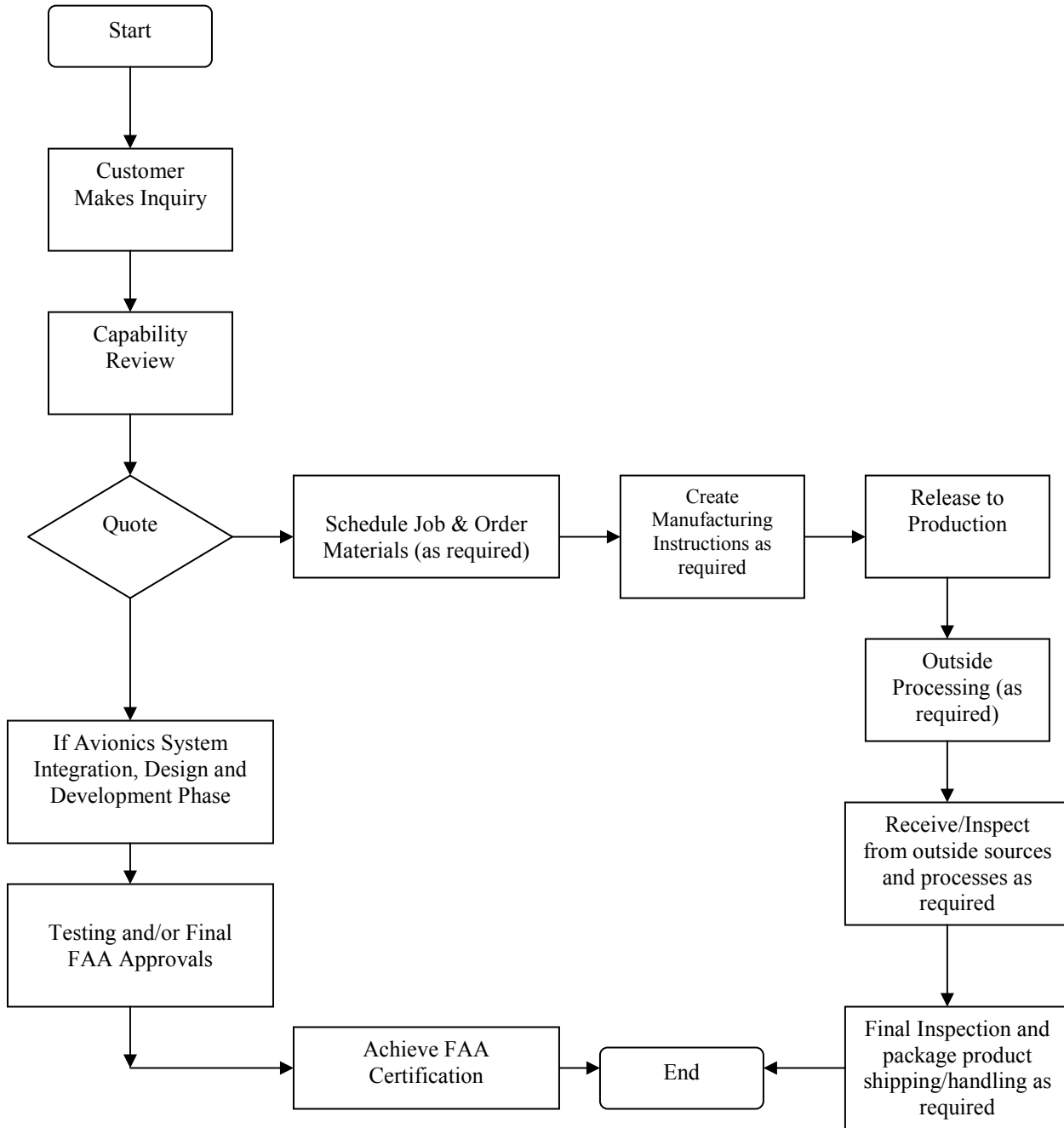
Global Aviation Technologies excludes servicing provisions of 7.5.1 and 7.5.2 in this system. This is justified by the fact that Global Aviation Technologies does not provide servicing or field service on a contractual basis.

Currently, Global Aviation Technologies does not outsource any processes that affect quality, i.e. management activities, provision of resources or measurement. Global Aviation Technologies does control subcontracted services through purchasing, see 7.4.

Quality Process Flowchart



GLOBAL AVIATION TECHNOLOGIES PRODUCTION FLOWCHART



4.2 Documentation Requirements

The quality management system documentation of Global Aviation Technologies contains all documentation required by ISO 9001:2000 and AS9100b as well as quality related documentation required by customers.

This manual provides for:

- a. documented statements of a quality policy and reference to quality objectives,
- b. a quality manual,
- c. documented procedures required by AS9100b (by inclusion or reference),
- d. documents needed by Global Aviation Technologies to ensure the effective planning, operation and control of its processes,
- e. records required by AS9100b (see 4.2.4)

Global Aviation Technologies ensures that personnel have access to quality management system documentation and are aware of relevant procedures. Customers and/or regulatory authorities or their representatives have access to agreed portions of the quality management system documentation and records.

4.2.1 The Global Aviation Technologies Quality Manual

This manual contains all required procedures or a reference to procedures and they are organized by the general clause numbers provided by AS9100b in order to show their relationship. Referenced procedures are made from the section of the manual corresponding to the top level numbered clauses of the standard.

A description of the interaction between the processes of the quality management system is shown on the flowcharts.

4.2.2 Control of Documents Procedure

Documents required by the quality management system are controlled. The procedure for control is as follows. Each document is approved for adequacy prior to issue, reviewed and updated and re-approved as needed by the Business Manager. Controlled copies of this manual that are printed shall be printed on light blue paper to indicate they are controlled. Revision notes are kept for Global Aviation Technologies procedures to ensure that changes are known. The Business Manager also ensures that documents remain legible and readily identifiable and that relevant versions of applicable documents are available at points of use.

Documents of external origin are identified and their distribution is controlled. A master file of drawings is maintained in QA. Electronic versions of customer supplied drawings are maintained, where applicable. A history file of closed purchase orders and the associated drawings is maintained for reference.

The Business Manager or authorized designee will ensure that suitable identification is applied to any obsolete documents, retained for any purpose in order to prevent unintended use. This marking shall be applied to the front page of documents that have attached pages or on each page if not attached. The marking shall be "Superseded by _____" or similar. These documents are stored in the master file until they are destroyed. Records are a special type of document and are controlled as described in section 4.2.3.

Where required by customer contracts or regulatory authority, the Business Manager or authorized designee coordinates any needed document changes.

4.2.3 Control of Records Procedure

Records shall be established and maintained to provide evidence of conformity to requirements and of the effective operation of the quality management system. Records are to remain legible, readily identifiable and retrievable. The procedure defining the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records is shown below. This procedure for record control may include records that are created and/or retained by vendors, as well as those required by customer contract. Vendor records are also controlled at the Purchasing level via flow down. At Global Aviation Technologies, shredding destroys all records. The function named as responsible is responsible for ensuring that records are created, maintained and made available in accordance with the table below.

The records covered by this procedure are shown in the following table.

4.2.4 Control of Records Chart

Records of (identification)	Location	Reference	Responsibility	Time (minimum)
Management reviews	Office	5.6.1	Business Manager	2 yrs
Training records	Office	6.2.2	Business Mgr and/or designee	2 yrs
Planning of Product (Production Build Order, Production Router, Parts Traveler)	Office	7.1	Quality	7 yrs
Quote reviews	Office	7.2.2	Business Manager	7 yrs
Contract reviews	Office	7.2.2	Business Manager	7 yrs
Design and Development Inputs	Office	7.3.2	Engineering	Life of product
Design and Development Review	Office	7.3.4	Engineering	Life of product
Design and Development Verification and actions taken	Office	7.3.5	Engineering	Life of product
Design and Development Validation and actions taken	Office	7.3.6	Engineering	Life of product
Engineering Change records (Engineering Notice DCN)	Office	7.3.7	Engineering	Life of product
Vendor Evaluations and actions arising from the evaluation	Office	7.4	Quality	2
Special Process records (Soldering, Crimping, Chem-Film)	Office	7.5.2	Quality	7
Inspection and test records (incoming)	Office	7.5.3	Quality	7
Inspection and test records (in process)	Office	7.5.3	Quality	7
Inspection and test records (final)(release of product)	Office	8.2.4	Quality	7
Customer Supplied Product	Office	7.5.4	Quality	2
Calibration records	Office	7.6	Quality	7
Internal audit results	Office	8.2.2	Quality	7
Nonconforming product and disposition (including waivers & concessions, if made)	Office	8.3	Quality	7
Corrective & Preventive actions including customer complaints, root cause investigations and follow-up	Office	8.5.2 & 8.5.3	Business Mgr and/or designee	7

4.3 Configuration Management

Global Aviation Technologies uses the Quality Management System processes to maintain the configuration of product. The company uses system documents such as the Production Build Order, Production Router, Parts Traveler to maintain the configuration of both made to order/specification type products and those products which are PMA (Part Manufacturer Approval).

5. MANAGEMENT RESPONSIBILITY

5.1 Management Commitment

Top management has provided evidence of its commitment to the development and implementation of the quality management system and continually improving its effectiveness by:

- a. communicating to the organization the importance of meeting customer as well as statutory and regulatory requirements. This is accomplished at Global Aviation Technologies by staff briefings and employee meetings covering these issues.
- b. establishing the quality policy/mission statement as follows:

Global Aviation Technologies mission is to provide unprecedented customer service while satisfying the increasing demand in custom system upgrades within the refurbishment/modification sector of the aviation industry.

- c. Global Aviation Technologies quality objectives are established and reviewed in the top management review of the quality system and it's performance. These objectives may be changed from time to time and are reflected in the minutes of the management review meeting. Where ever possible, metrics are employed to chart our progress in meeting the quality objectives.
- d. Management reviews are conducted covering applicable quality issues at least annually. Minutes of the meeting are used to record required information. (Reference ¶ 5.6)
- e. Availability of adequate quality system resources will be included in management reviews of the quality system and in staff meetings as appropriate.

5.2 Customer Focus

Top management ensures that customer requirements are determined and are met with the aim of enhancing customer satisfaction.

5.3 Quality Policy/Mission statement

Top management has ensured that the quality policy/mission statement (reference ¶ 5.1b) is appropriate to the purpose of the organization and includes a commitment to comply with requirements and continually improve the effectiveness of the quality management system. Top management also has provided a framework for establishing and reviewing quality objectives in the management review meetings. Top management has ensured that the quality policy/mission statement and objectives are communicated and understood within the organization.

At least annually at the management review meeting, the quality policy, this document and quality objectives are reviewed for continuing suitability.

5.4 Planning

5.4.1 Quality Objectives

Top management has ensured that quality objectives, including those needed to meet requirements for product [see 7.1 a)], are established at relevant functions and levels within the organization. The quality objectives are measurable and consistent with the quality policy.

QUALITY OBJECTIVE: Maintain Production Documentation as defined in 7.5.1.1 in tact and with applicable job with a goal of no more than 3 occurrences per calendar year.

QUALITY OBJECTIVE: Maintain a second review of PO's to ensure all related purchasing requirements have been adequately and accurately flowed down; with a goal of no more than 5 occurrences per calendar year.

5.4.2 Quality Management System Planning

Top management shall ensure that the planning of the quality management system is carried out in order to meet the requirements given in 4.1, as well as the quality objectives. When changes to the quality management system are anticipated, management will plan the implementation of the change so that the integrity of the quality system is maintained.

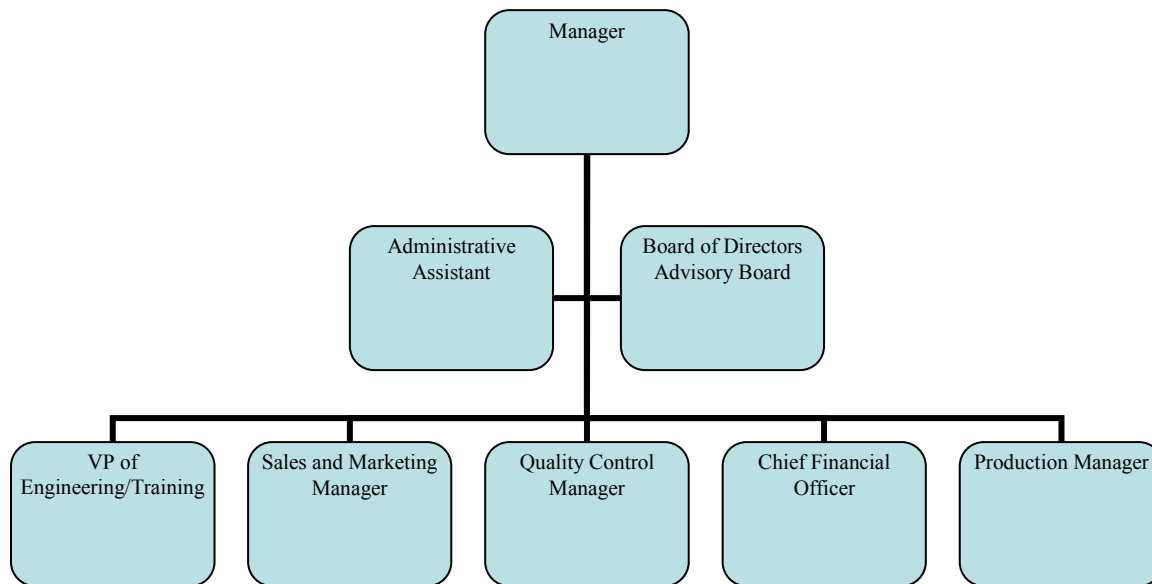
5.5 Responsibility, Authority and Communication

5.5.1 Responsibility and Authority

Top management has ensured that the responsibilities and authorities are defined and communicated within the organization.

Global Aviation Technologies' Organizational Management (including job descriptions) is as follows:

Functional Organization Chart



Job Descriptions

Manager: Plans, develops, and establishes policies and objectives of business organization in accordance with board directives and owners. Plan business objectives to develop organizational policies to coordinate functions and operations between divisions and departments, and to establish responsibilities and procedures for attaining objectives. Reviews activity reports and financial statements to determine progress and status in attaining objectives and revises objectives and plans in accordance with current conditions. Assists in formulation of financial programs to provide funding for new or continuing operations to maximize returns on investments, and to increase productivity. Works with VP and CFO to plan and develop industrial, labor, and public relations policies designed to improve company's image and relations with customers, employees, stockholders, and public. Evaluates performance of executives for compliance with established policies and objectives of firm and contributions in attaining objectives. May preside over board of directors/advisory board. May serve as chairman of committees, such as management review board, executive board, engineering, quality, and sales. Oversees production activities in the absence of Production Manager.

Chief Financial Officer: Monitors overall financial performance of company at all levels. Directs and coordinates formulation of financial programs to provide funding for new or continuing operations to maximize returns on investments, and to increase productivity. Works with VP and Manager to plan and develop industrial, labor, and public relations policies designed to improve company's image and relations with customers, employees, stockholders, and public. Evaluates performance of executives for compliance with established policies and objectives of firm and contributions in attaining objectives. May preside over board of directors/advisory board. May serve as chairman of committees, such as management review board, executive board, engineering, quality, and sales.

Administrative Assistant: Aids executive/s in staff capacity by coordinating office services, such as personnel, budget preparation and control, housekeeping, records control, and special management studies: Studies management methods in order to improve workflow, simplify reporting procedures, or implement cost reductions. Analyzes unit operating practices, such as recordkeeping systems, forms control, office layout, suggestion systems, personnel and budgetary requirements, and performance standards to create new systems or revise established procedures. Analyzes jobs to delimit position responsibilities for use in wage and salary adjustments, promotions, and evaluation of workflow. Studies methods of improving work measurements or performance standards. Coordinates collection and preparation of operating reports, such as time-and-attendance records, terminations, new hires, transfers, budget expenditures, and statistical records of performance data. Prepares reports including conclusions and recommendations for solution of administrative problems. Issues and interprets operating policies. Reviews and answers correspondence. May assist in preparation of budget needs and annual reports of organization. May interview job applicants, conduct orientation of new employees, and plan training programs. May direct services, such as maintenance, repair, supplies, mail, and files. May compile, store, and retrieve management data, using computer.

Job Descriptions, Cont.

Vice President of Engineering: Directs and coordinates activities of one or more departments, such as engineering, operations, or sales, or major division of business organization, and aids chief administrative officer in formulating and administering organization policies: Participates in formulating and administering company policies and developing long range goals and objectives. Directs and coordinates activities of department or division for which responsibility is delegated to further attainment of goals and objectives. Reviews analyses of activities, costs, operations, and forecast data to determine department or division progress toward stated goals and objectives. Confers with chief administrative officer and other administrative personnel to review achievements and discuss required changes in goals or objectives resulting from current status and conditions. May perform duties of Manager during absence. May serve as member of management committees as stated under Manager's duties.

Sales and Marketing Manager: The face of the company. Sells products and provides customers with technical engineering services and electrical sub-assembly manufacturing. Develops marketing materials and aids management in establishing budget and ensures it is adhered to. Consults with all other management team members to develop initiatives and seek budget approval.

Quality Control Manager: Supervises and coordinates activities of workers engaged in inspecting incoming/outgoing materials, in process of components, and finished fabricated products to ensure adherence to company quality standards and customer specifications. Coordinates with engineering to draw, sketch, or write inspection procedure for each new item to be fabricated, indicating areas to be examined, measuring devices to be used, and maximum and minimum acceptable dimensions. Distributes drawing and procedure to production control, and inspection work stations. Repeats inspection procedure until product meets quality standards and specifications are attained. Confers with customer representative to resolve complaints. Monitors all quality, vendor and calibration records. Notifies suppliers and subcontractors of reasons for rejection of materials and parts received. Sits on management review board and performs other duties as described under normal supervisory duties.

Production Manager: Supervises, coordinates and conducts activities of workers engaged in manufacturing processes, such as soldering, assembling, and applying knowledge of processes involved, production methods, and products. Trains employees in work methods and procedures. Inspects products to verify conformance to specifications and directs setup and adjustments of machines or processes as necessary. Sits on management review board and performs all normal supervisory duties.

5.5.2 Quality Management Representative

The Quality Manager at Global Aviation Technologies serves as the Quality Management Representative (QMR). In addition to any other responsibilities, the QMR has the responsibility and authority to:

- a. ensure that processes needed for the quality management system are established, implemented and maintained,
- b. report to management on the performance of the quality management system and any needs for improvement,
- c. ensure the promotion of awareness of customer requirements throughout the organization, and
- d. resolve matters pertaining to quality.

5.5.3 Internal Communication

Top management has ensured that appropriate communication processes are established within the organization and that communication takes place regarding the effectiveness of the quality management system. Global Aviation Technologies accomplishes this by periodic employee briefings and quality information displayed regarding objectives, goals and quality system audit results.

5.6 Management Review

5.6.1 General

Top management shall review the quality management system at least annually. This review is conducted to ensure its continuing suitability, adequacy and effectiveness as well as assessing opportunities for improvement and the need for changes to the quality management system, including the quality policy and quality objectives. Minutes kept provide the records from management reviews.

5.6.2 Review Input

The input to management review includes information on

- a) results of audits,
- b) customer feedback,
- c) process performance and product conformity,
- d) status of preventive and corrective actions,
- e) follow-up actions from previous management reviews,
- f) changes that could affect the quality management system, and
- g) recommendations for improvement.

5.6.3 Review Output

The output from the management review includes decisions and actions related to the:

- a. improvement of the effectiveness of the quality management system and its processes,
- b. improvement of product related to customer requirements, and
- c. resource needs.

6. RESOURCE MANAGEMENT

6.1 Provision of Resources

Global Aviation Technologies determines and provides the resources needed to implement and maintain the quality management system and continually improve its effectiveness. Management ensures that resources are available to enhance customer satisfaction by meeting customer requirements.

6.2 Human Resources

Management ensures that personnel performing work affecting product quality are competent on the basis of appropriate education, training, skills and experience. These requirements are supported by education, training, and/or employment records.

6.2.1 Competence, Awareness and Training

Global Aviation Technologies determines the necessary competence for personnel performing work affecting product quality as described above and then provides training or takes other actions to satisfy these needs. Observation of demonstrated ability is used to evaluate the effectiveness of the training and actions taken. This process ensures that Global Aviation Technologies personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality objectives. Appropriate records of education, training, skills and experience are maintained.

6.3 Infrastructure

Management at Global Aviation Technologies determines the need for infrastructure and resources to achieve conformity to product requirements. These resource needs are obtained through staff meetings and the review of the quality management system. Items that may be considered in staff meetings and management reviews are buildings, workspace and associated utilities, processing equipment and supporting services as appropriate.

6.4 Work Environment

Global Aviation Technologies provides the work environment needed to achieve conformity to product requirements. This may include control of temperature, humidity, lighting and cleanliness. Quality system audits may provide feedback to management on work environment issues.

7. PRODUCT MANUFACTURING

7.1 Planning of Product Manufacturing

Global Aviation Technologies has developed plans for processes needed for manufacture of product. Planning of product manufacturing is provided on the Production Build Order, and its referenced documents. This method of producing product planning is consistent with the requirements of the other processes of the quality management system. Global Aviation Technologies plans product manufacturing taking into account the following items as appropriate:

- a. quality objectives and requirements for the product;
- b. the need to establish processes, documents, and provide resources specific to the product;
- c. required verification, validation, monitoring, inspection and test activities specific to the product and the criteria for product acceptance
- d. records needed to provide evidence that the manufacturing processes and resulting product meet requirements (see 4.2.4);
- e. the identification of resources to support production.

7.2 Customer-Related Processes

7.2.1 Determination of Requirements Related to the Product

Global Aviation Technologies has determined product requirements specified by the customer, including the requirements for delivery. Global Aviation Technologies does not provide post-delivery activities. Where the customer does not state requirements, but they are found necessary for the specified or intended use, Global Aviation Technologies documents these requirements. Global Aviation Technologies also makes known and translates into requirements any statutory and regulatory requirements related to the product as well as any additional requirements determined by Global Aviation Technologies.

7.2.2 Review of Requirements Related to the Product

Global Aviation Technologies reviews requirements related to the product. This review shall be conducted prior to the organization's commitment to supply a product to the customer. All quotations, contracts and orders, including changes made, are reviewed to ensure that:

- a. product requirements are defined,
- b. any contract or order requirements differing from those previously expressed are resolved,
- c. Global Aviation Technologies has the ability to meet the defined requirements, and that
- d. risks due to new technology, new processes or short delivery times are evaluated.

Records of the results of the review and actions arising from the review are maintained as quality records.

Global Aviation Technologies accepts purchase orders or requests for quotations. If product requirements are changed, Global Aviation Technologies ensures that relevant documents are amended and that relevant personnel are made aware of the changed requirements.

7.2.3 Customer Communication

Global Aviation Technologies determines and implements effective arrangements for communicating with customers in relation to product information, inquiries, contracts or orders including amendments. Global Aviation Technologies solicits customer feedback and effectively handles customer complaints.

7.3 Design and Development

Global Aviation Technologies performs design and development activities that meet the requirements AS9100b.

Global Aviation Technologies technical data required by CFR 21.303 (c)(3) includes all drawings, detail parts drawings, upper assembly or envelope drawings, installation drawings, process specifications, material specifications, software specifications, test specifications, bill or list materials sheets/drawings, maintenance, overhaul, structural repairs manuals, wiring diagrams and other design data approved by the FAA.

7.3.1 Design and development planning

Designs and development originate in the Sales and/or Engineering department. Using project management planning tools, the design leader establishes a plan that includes:

- design and development in structured and manageable stages i.e (task sequence, mandatory steps, significant stages, and method of configuration control).
- reviews of design and development.
- verification activities.
- the identified validation.

Where appropriate, due to complexity, Global Aviation Technologies shall give consideration to the following activities:

- structuring the design effort into significant elements, and
- for each element, analyzing the tasks and the necessary resources for its design and development. This analysis shall consider an identified responsible person, design content, input data, planning constraints, and performance conditions. The input data specific to each element shall be reviewed to ensure consistency with requirements.

Control of the design and development process occurs when the team leader utilizes the planning tools to:

- assign responsibilities.
- establish authorities.
- update and track progress.

Planning output shall be updated, as appropriate, as the design and development progresses.

The different design and development tasks to be carried out shall be defined according to specified safety or functional objectives of the product in accordance with customer and/or regulatory authority requirements.

7.3.2 Design and development inputs

Global Aviation Technologies Inc. determines design and development input requirements including:

- the functional and performance requirements as derived from customer input
- legal and regulatory requirements which apply
- useful information or experience from previous similar design and development efforts
- other necessary requirements

Before finalizing the documentation of all required inputs, resolution of incomplete, ambiguous or conflicting requirements must occur. Design input records are kept, see 4.2.3.

7.3.3 Design and development outputs

Global Aviation Technologies design and development outputs will:

- comply with the design and development input requirements.
- include information needed for purchasing, production and service.
- include or reference acceptance criteria.
- indicate those characteristics of the design that are critical to the safe and proper operation of the product, including the identification of key characteristics, when applicable, in accordance with design or contract requirements.
- be approved before issuance.

Global Aviation Technologies shall define all pertinent data required, to allow the product to be identified, manufactured, inspected, used and maintained. Examples of data include:

- drawings, part lists, specifications
- a listing of those drawings, part lists, and specifications necessary to define the configuration and the design features of the product
- information on material , processes, type of manufacturing and assembly of the product necessary to ensure the conformity of the product.

7.3.4 Design and development review

During the evolution of each product design and development, planned reviews shall occur. The reviews are intended to assure that requirements are being fulfilled and to authorize progression to the next stage. When they are not, those involved in the review must propose a remedy for each identified problem. All functions concerned with the stage being reviewed are represented at the review. Design or development review results and actions taken are recorded, see 4.2.4

7.3.5 Design and development verification

Global Aviation Technologies ensures that output meets design and development inputs through design and development verification. Records of verifications are created and any necessary actions are retained in accordance with 4.2.4.

7.3.6 Design and development validation

Product or service resulting from design and development efforts at Global Aviation Technologies is validated as planned. Validation assures that it performs to expectations or that it is suitable for application. Records of validations are created and retained in accordance 4.2.4.

7.3.6.1 Documentation of Design and/or Development Validation

At the completion of design and/or development, Global Aviation Technologies shall ensure that reports, calculations, test results, etc., demonstrate that the product definition meets the specification requirements for all identified operational conditions.

7.3.6.2 Design and/or Development Verification and Validation Testing

Where tests are necessary for verification and validation, these tests shall be planned, controlled, reviewed, and documented to ensure and prove the following:

- test plans or specifications identify the product being tested and the resources being used, define test objectives and conditions, parameters to be recorded, and relevant acceptance criteria;
- test procedures describe the method of operation, the performance of the test and the recording of the results;
- the correct configuration standard of the product is submitted for the test;
- the requirements of the test plan and the test procedures are observed;
- the acceptance criteria are met.

7.3.7 Control of Design and Development Changes

Global Aviation Technologies ensures the identification, documentation and control of all design and development changes. When required by contract or regulatory authority, the change control process provides for customer and/or regulatory agency approval of changes. Control includes the assessment of the impact of changes upon component parts and completed products including those that have already been delivered. Control also includes the determination of treatment required for each change. That treatment may include verification and/or validation. Changes deemed ready for implementation are approved in accordance with applicable procedures. Change review records and necessary actions are as indicated section 4.2.3.

7.4 Purchasing

7.4.1 Purchasing Process

Global Aviation Technologies ensures that purchased product conforms to specified requirements. The type and extent of control applied to the vendor and the purchased product is dependent upon the effect of the purchased product on the quality of our product.

Global Aviation Technologies is responsible for the quality of all products purchased from vendors, including any customer-designated sources. GAT does not require monitoring nor evaluation of vendors of office supplies and fixed assets (i.e. equipment and tooling manufacturers, etc.); neither are these vendors required to be listed on GAT's Approved Vendors List.

Global Aviation Technologies evaluates and selects vendors based on their ability to supply product in accordance with the stated requirements. Vendors may be approved by at least one of the following: Onsite Audit, Mail Survey, Certificate of Registration (i.e. ISO and/or AS9100), or any FAA approval such as PMA, TSO, TSOA, etc. Additionally, under Research and Development (product certification or prototype) the authorized Global Aviation Technologies representative may approve a vendor for a "one-time" purchase only. Vendor shall be listed as such on the Approved Vendors List.

Non FAA Approval Holders and non ISO/AS9100 approved vendors are Re-evaluated by Global Aviation Technologies at least every two years, based on the performance of the vendor. Records of the results of evaluations and any necessary corrective actions arising from evaluations are maintained as quality records.

Global Aviation Technologies maintains a list of approved vendors that includes the scope of their approval. Vendors to Global Aviation Technologies are reviewed (re-evaluated) for performance as noted above. Periodic reviews are conducted based on the Non-Conformance Log. The results of these reviews are used as a factor in establishing the level of controls to be implemented. When vendors do not meet requirements, a corrective action request may be issued to the vendor. Any vendor that fails to satisfactorily complete a corrective action request may be removed from the approved vendor's list.

Global Aviation Technologies ensures that where required, Global Aviation Technologies and all vendors use customer-approved special process sources.

The Business Manager or authorized designee, working with the quality function has the responsibility for approving vendor quality systems and has the authority to disapprove the use of sources.

7.4.2 Purchasing Information

Purchase orders or referenced attachments describe the product to be purchased, **including where appropriate:**

- a. requirements for approval of product, procedures, processes and equipment,
- b. requirements for qualification of personnel,
- c. quality management system requirements,
- d. the name or other positive identification, and applicable issues of specifications, drawings, process requirements, inspection instructions and other relevant technical data,
- e. requirements for design, test, examination, inspection and related instructions for acceptance by Global Aviation Technologies,
- f. requirements for test article (e.g., production method, number, storage conditions, etc.) for design approval, inspection, investigation or auditing,
- g. requirements relative to vendor notification of nonconforming product and arrangements for the Global Aviation Technologies approval of vendor nonconforming material,
- h. requirements for the vendor to notify Global Aviation Technologies of changes in product and/or process definition and, where required, obtain Global Aviation Technologies approval,
- i. right of access by Global Aviation Technologies, the customer of Global Aviation Technologies, and regulatory authorities to all facilities involved in the order and to all applicable records, and
- j. requirements for the vendor to flow down to sub-tier vendors the applicable requirements in the purchasing documents, including key characteristics where required.

Global Aviation Technologies ensures the accuracy of specified purchase requirements prior to communication to the vendor.

7.4.3 Verification of Purchased Product

Global Aviation Technologies has established and implemented inspection or other activities necessary to ensure that purchased product meets specified purchase requirements. Global Aviation Technologies verification activities may include **as applicable:**

- a. obtaining objective evidence of the quality of the product from vendors including: accompanying documentation, certificate of conformity, test reports, statistical records, and process control records,
- b. inspection and audit at vendor's premises,
- c. review of the required documentation, and
- d. inspection of products upon receipt.

Purchased product shall not be used or processed until it has been verified as conforming in accordance with the specified purchase requirements.

Where Global Aviation Technologies utilizes test reports to verify purchased product, the data in those reports must be acceptable per applicable specifications.

Global Aviation Technologies periodically validates, as applicable, test reports on raw material or as contractually required.

Global Aviation Technologies does not delegate verification activities to a vendor.

Where Global Aviation Technologies or the customer of Global Aviation Technologies intends to perform verification at the vendor's premises, these verification arrangements and the method of product release is contained in the purchasing information. Where specified in the contract, the customer or the customer's representative shall be afforded the right to verify at the vendor's premises and the organization's premises that subcontracted product conforms to specified requirements.

Verification by the customer is not used by Global Aviation Technologies as evidence of effective control of quality by the vendor and shall not absolve Global Aviation Technologies of the responsibility to provide acceptable product, nor does it preclude subsequent rejection by the customer.

7.5 Production and Manufacturing

7.5.1 Control of Production and Manufacturing

Global Aviation Technologies considers the following when planning the manufacture of product, **where applicable:**

- the establishment of process controls and development of control plans where key characteristics have been identified,
- the identification of in-process verification points when adequate verification of conformance cannot be performed at a later stage of manufacturing,
- the design, manufacture, and use of tooling so that variable measurements can be taken, particularly for key characteristics, and
- the qualification of operators or monitoring of special processes, where results cannot be confirmed by direct inspection or test.

Global Aviation Technologies plans and carries out production in accordance with the applicable procedures and operations in sequence on the Production Router and/or Manufacturing Instructions.

Production controlled conditions include, **as applicable the:**

- a) availability of information that describes the characteristics of the product,
- b) instructions on the Production Router and/or Manufacturing Instructions, Production Build order as necessary,
- c) use of suitable equipment,
- d) availability and use of monitoring and measuring devices as needed,
- e) implementation of monitoring and measurement as required by the product,
- f) implementation of release and delivery of products,
- g) accountability for all product during manufacture (e.g., part quantities, split orders, and nonconforming product),
- h) evidence that all manufacturing and inspection operations have been completed as planned, or as otherwise documented and authorized,
- i) provision for the prevention, detection, and removal of foreign objects,
- j) monitoring and control of utilities and supplies such as water, compressed air, electricity and chemical products to the extent they affect product quality, and
- k) criteria for workmanship, which is described in written standards, representative samples or illustrations.

7.5.1.1 Production Documentation

Production operations are carried out in accordance with approved data. This data shall include **as necessary**:

- a) drawings, parts lists, inspection points, production documents, including the Production Build Order, Parts Traveler, Production Router, Manufacturing Instructions and its references and inspection documents, Snag Log and
- b) a list of specific or non-specific tools and/or numerical control (NC) machine programs required and any specific instructions associated with their use.

7.5.1.2 Control of Production Process Changes Procedure

Engineering or any member of MRB is authorized to approve changes to production processes. Global Aviation Technologies obtains approval of changes that require customer and/or regulatory authority approval in accordance with contract or regulatory requirements. Changes affecting processes, production equipment, tools and programs are documented. The procedure for making changes is as follows:

An employee may request that a change be made. Engineering or the appropriate designee will review the request and determine if the change is desirable. If the change is made it will be either:

- a) Changed, if required on all copies of the planning or related documents initialed and dated by a person authorized to make the change, or
- b) The planning will be revised, reviewed and re-issued to production with the required changes.

The quality function confirms that the desired effect has been achieved without adverse effects to product quality.

7.5.1.3 Control of Production Equipment, Tools and Numerical Control (N.C.) Machine Programs PROCEDURE

Production equipment, tools and software programs shall be validated prior to first use as required, and maintained and re-validated periodically. Validation prior to production use includes verification of the first article produced to the design. At least annually tools and production equipment in storage shall be checked to ensure that they are being preserved with out damage or deterioration.

7.5.1.4 Control of work transferred, on a temporary basis, outside of the Global Aviation Technologies facility

Currently, Global Aviation Technologies does not transfer work on a temporary basis outside of the facility.

7.5.1.5 Control of Service Operations

Global Aviation Technologies does not provide servicing or work in a customer's facility. Global Aviation Technologies is an FAA PAH (Parts Approval Holder).

7.5.2 Validation of Processes for Production and Service Provision (Special Processes)

Global Aviation Technologies validates any processes for production where the resulting output cannot be verified by subsequent monitoring or measurement. This includes any processes where deficiencies become apparent only after the product is in use or the service has been delivered.

Examples of Special Processes at Global Aviation Technologies include, but are not limited to:

- Soldering (controlled by Process Specification PS-124)
- Chem-Film (controlled by Process Specification PS-108)
- Solvent Cleaning (controlled by Process Specification PS-109)
- Deoxidizing Aluminum Parts (controlled by Process Specification PS-110)
- Painting Parts (controlled by Process Specification PS-111)
- Application of Poly Topcoats (controlled by Process Specification PS-117)
- Potting of Electrical Components (controlled by Process Specification PS-126)
- Potting of Electrical Connectors and Components for Non-Fuel Areas (controlled by Process Spec PS-129)

The validation method (specifications) used demonstrates the ability of these processes to achieve planned results. Global Aviation Technologies has established arrangements for these processes, as applicable:

- a) defined criteria for review and approval of the processes including qualification and approval of special processes prior to use where required,
- b) approval of equipment and qualification of personnel, as required,
- c) use of specific methods and procedures to control the significant operations and parameters of special processes in accordance with documented process specification,
- d) requirements for quality records, and
- e) revalidation requirements, if any.

7.5.3 Identification and Traceability

Where practical Global Aviation Technologies identifies the product by suitable markings applied to the product, tag or container. During the manufacturing process the product may be identified by the Parts Traveler (or suitable paperwork) accompanying the product.

Global Aviation Technologies maintains the identification of the configuration of the product in order to identify any differences between the actual configuration and the agreed configuration.

Global Aviation Technologies identifies the product status by appropriate approvals on Production Router and/or Manufacturing Instructions.

- A. Material used in fabrication of parts will, as appropriate, retain their manufacturer's identification (mill marking, part number, etc.) or be identified by the use of in-house inventory tags. Additionally, all bins, shelves, and storage areas are clearly labeled to accurately identify contents and accommodate the necessary segregation and protection while in storage. Only parts and/or materials that have passed receiving inspection will be released from the storage area.
- B. Materials subject to damage and deterioration will be suitably stored, identified, and adequately protected using the best commercial/industry practices, or as recommended by the manufacturers or FAA approved data. Those materials which are subject to deterioration from prolonged storage will be inspected at defined intervals and disposition as required.
- C. Storage areas will be monitored by Quality Control and only those parts/materials that have been accepted by Quality Control will be stored in the storage area.

STAMP CONTROL PROCEDURE

Stamps are used to mark paperwork. Stamps are issued and controlled by quality. A listing of issued stamps is located in Quality.

To maintain traceability, Global Aviation Technologies controls and records the unique identification of the product or lots as a quality record. According to the level of traceability required by customer contract, regulatory, or other established requirement, the Global Aviation Technologies' system provides for:

- a) identification to be maintained throughout the manufacture and delivery;
- b) for an assembly, the identity of its components and those of the next higher assembly to be traced;
- c) for a given product, by serial number, a sequential record of its production (manufacture, assembly, inspection) to be retrieved.

7.5.4 Customer Property

Global Aviation Technologies exercises care with customer property while it is under our control. Global Aviation Technologies identifies, verifies, protects and safeguards customer property provided for use or incorporation into the product. If any customer property is lost, damaged or otherwise found to be unsuitable for use, it will be reported to the customer and quality records will be maintained. Customer property can include intellectual property, including customer-furnished data used for design, production and/or inspection.

7.5.5 Preservation of Product

Global Aviation Technologies preserves the conformity of product during internal processing and delivery to the intended destination. This preservation includes identification, handling, packaging, storage and protection. Preservation also applies (if appropriate) to the component parts of a product. Preservation of product includes, where applicable in accordance with product specifications and/or applicable regulations, provisions for:

- a) prevention, detection and removal of foreign objects;
- b) marking and labeling including safety warnings;
- c) shelf life control and stock rotation;
- d) special handling for hazardous materials.

Global Aviation Technologies ensures that documents that are required to accompany the product, by the contract or order are present at delivery and are protected against loss and deterioration.

7.6 Control of Monitoring and Measuring Devices

Global Aviation Technologies determines the monitoring and measurement to be undertaken and the monitoring and measuring devices needed to provide evidence of conformity of product to specified requirements.

Global Aviation Technologies maintains a list of measuring devices that defines the process employed for their calibration including details of equipment type, unique identification, location, frequency of checks, check method and acceptance criteria. The list of devices includes as applicable, test hardware, test software, automated test equipment used to produce inspection data. It also includes personally owned and customer supplied equipment used to provide evidence of product conformity.

Global Aviation Technologies uses processes to ensure that monitoring and measurement can be carried out in a manner that is consistent with the measurement requirements. Additionally, Global Aviation Technologies ensures that environmental conditions are suitable for the calibrations, inspections, measurements and tests being performed.

Where necessary to ensure valid results, measuring equipment is:

- a) calibrated or verified at specified intervals on the list, or prior to use, against measurement standards traceable to international or national measurement standards; if no such standards exist, the basis used for calibration or verification shall be recorded;
- b) adjusted or re-adjusted as necessary;
- c) identified to enable the calibration status to be determined;
- d) safeguarded from adjustments that would invalidate the measurement result;
- e) protected from damage and deterioration during handling, maintenance and storage;
- f) Quality monitors due dates of measuring devices as appropriate.

In addition, the quality function assesses and records the validity of the previous measuring results if the equipment is found not to conform to requirements. Global Aviation Technologies will take appropriate action for the equipment and any product affected. Records of the results of calibration and verifications are maintained as quality records.

If used in the monitoring and measurement of specified requirements, the ability of computer software to satisfy the intended application shall be confirmed. This is undertaken prior to initial use and reconfirmed as necessary.

8. MEASUREMENT, ANALYSIS AND IMPROVEMENT

8.1 General

Global Aviation Technologies plans and implements the monitoring, measurement, analysis and improvement processes required to:

- a) demonstrate conformity of the product,
- b) ensure conformity of the quality management system, and
- c) continually improve the effectiveness of the quality management system.

This includes determination of applicable methods, including statistical techniques, and the extent of their use.

8.2 Monitoring and Measurement

8.2.1 Customer Satisfaction

As one of the measurements of the performance of the quality management system, Global Aviation Technologies monitors information relating to customer perception as to whether or not we have met customer requirements. Global Aviation Technologies uses a questionnaire that may be administered by phone, mail or e-mail to obtain this information. Key customers are asked to respond and the results are reported at the management review meetings.

8.2.2 Internal Audit Procedure

Global Aviation Technologies conducts internal audits to determine whether the quality management system is conforming to the planned arrangements. Initially, these will be conducted annually. However, audits may be planned IAW their status, importance, performance history, FAA, customers or other regulatory authority. This includes a review of conformance to the requirements AS9100b and this manual. The purpose of the audit is to demonstrate that the quality system is effectively implemented and maintained. The internal audit takes into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits. The Quality Management Representative (QMR), or Business Manager, defines the audit criteria, scope, frequency and methods. Selection of auditors and the conduct of the audits ensure objectivity and impartiality of the audit process. Auditors shall not audit their own work.

The QMR or Business Manager establishes the responsibilities and requirements for planning and conducting audits and for reporting the results. Audit plans, checklists and resulting corrective and/or preventive action requests are maintained as quality records. The management responsible for the area being audited ensures that actions are taken without undue delay to eliminate detected nonconformities and their causes.

Follow-up audit activities include the verification of the actions taken and the reporting of verification results, on the corrective and preventive action form. Check sheets and/or flowcharts are developed to support audit of the quality management system requirements. The acceptability of the selected tools are to be measured by an evaluation of the effectiveness of the internal audit process and overall organization performance.

The scope of the internal audits shall also include Global Aviation Technologies demonstrated ability to meet contract and/or regulatory requirements.

8.2.3 Monitoring and Measurement of Processes

Global Aviation Technologies uses suitable methods for monitoring and measurement of the quality management system processes. The monitoring and measurement activities are included in the flowcharts that are a part of this manual. These methods demonstrate the ability of the processes to achieve planned results. If planned results are not achieved, correction and/or corrective action shall be taken, as appropriate, to ensure conformity of the product.

In the event of process nonconformity, Global Aviation Technologies will:

- a) take appropriate action to correct the nonconforming process,
- b) evaluate whether or not the process nonconformity has resulted in product nonconformity, and
- c) identify and control the nonconforming product in accordance with paragraph 8.3.

8.2.4 Monitoring and Measurement of Product

Global Aviation Technologies monitors and measures product characteristics to verify that product requirements have been met. This is carried out in accordance with the Production Build Order, Production Router and its referenced attachments.

If key characteristics have been identified, they are monitored and controlled.

Global Aviation Technologies does not use sampling inspection as a means of product acceptance.

No product is used until it has been inspected or otherwise verified as conforming to specified requirements.

Global Aviation Technologies does not release product under urgent release or positive-recall procedures.

Evidence of conformity with the acceptance criteria shall be maintained. Quality records shall indicate the person(s) authorizing release of product. No product will be delivered until all the operations on the Production Build Order and its referenced attachments, have been satisfactorily completed, unless otherwise approved by the customer and/or relevant authority.

8.2.4.1 Inspection Documentation

Measurement requirements for product acceptance are documented on the Production Build Order and/or referenced documents and/or drawings. Information provided includes:

- a) criteria for acceptance and/or rejection,
- b) where in the sequence measurement and testing operations are performed,
- c) a record of the measurement results, (as required by the customer), and
- d) the type of measurement instruments required and any specific instructions associated with their use.

Test records shall show actual test results data when required. Where required to demonstrate product qualification, Global Aviation Technologies shall ensure that records provide evidence that the product meets the defined requirements.

8.2.4.2 First Article Inspection

Global Aviation Technologies provides for first article inspections, where required. A representative part from the first production run is verified and the results recorded in accordance with the Production Build Order and/or referenced documents and/or drawings. A new first article inspection is required following any subsequent change that invalidates the previous first article inspection result.

8.3 Control of Non-Conforming Product Procedure

Global Aviation Technologies ensures that product which does not conform to requirements is identified and controlled to prevent its unintended use or delivery. Nonconforming product includes nonconforming product returned from a customer. The controls and related responsibilities and authorities for dealing with nonconforming product shall be defined as follows:

Where practical, purchased nonconforming product may be placed in the MRB cabinet for disposition.

Nonconforming products shall be conspicuously marked with a Red Tag and placed in the MRB cabinet to prevent unintended use. Nonconforming product may be dispositioned as:

Scrap
Rework
Repair (conditional, see below)
Use-as-is (conditional, see below)
RTV (return to vendor)

The MRB (Management Review Board) may disposition nonconforming product. At Global Aviation Technologies, the Business Manager must approve personnel responsible for nonconforming product disposition. These members shall be approved based on area of expertise, education, background, experience and any other competencies deemed necessary for the MRB function.

The MRB may disposition product in one or more of the following ways:

- a) by ensuring action is taken to eliminate the detected nonconformity;
- b) by authorizing its use, release or acceptance under concession by a relevant authority and, where applicable, by the customer;
- c) by taking action to preclude its original intended use or application.

Repair/UAI Conditions: Global Aviation Technologies will not use dispositions of use-as-is or repair if the product is produced to customer design or the nonconformity results in a departure from the contractual requirements of the customer unless approved via Change Order. Global Aviation Technologies may use dispositions of use-as-is or repair if approved by the MRB only for products designed and manufactured by GAT.

Product dispositioned for scrap shall be Red Tagged and positively controlled, until physically rendered unusable.

Records of the nature of nonconformities and any subsequent actions taken, including concessions are maintained as quality records. During production, scrap quantities are recorded on the Production Build Order and/or referenced documents.

If nonconforming product is corrected, it is re-verified to demonstrate conformity to the requirements. If nonconforming product is detected after delivery or use has started, Global Aviation Technologies will take action appropriate to the effects, or potential effects, of the nonconformity.

Control of Non-conforming product-Cont.

In addition to any contract or regulatory authority reporting requirements, the control of nonconforming product shall provide for timely reporting of delivered nonconforming product that may affect reliability or safety. Notification to concerned parties shall include a clear description of the nonconformity that includes as necessary, parts affected, customer and/or organization part numbers, quantity, and date(s) delivered.

8.4 Analysis of Data

Global Aviation Technologies determines, collects and analyzes data to demonstrate the suitability and effectiveness of the quality management system and to evaluate where continual improvement of the effectiveness of the quality management system can be made. This includes data generated as a result of monitoring and measurement and from other relevant sources. The analysis of data provides information relating to:

- a) customer satisfaction,
- b) conformity to product requirements,
- c) characteristics and trends of processes and products including opportunities for preventive action, and
- d) vendors

8.5 Improvement

8.5.1 Continual Improvement

Global Aviation Technologies strives to continually improve the effectiveness of the quality management system through the use of the quality policy, quality objectives, audit results, analysis of data, corrective and preventive actions and management review.

8.5.2 Corrective Action Procedure

Global Aviation Technologies takes action to eliminate the cause of nonconformities in order to prevent recurrence. Corrective action taken is appropriate to the effects of the nonconformities encountered. The procedure defining requirements for corrective action is shown below.

All proposed corrective action is reported to the Quality Management Representative and/or Business Manager on the (CAR) Corrective Action Report. Management will review corrective action status as well as data concerning product nonconformity and reports of scrap that are provided by the quality function.

Customer complaints may be documented using the CAR form. Quality Management reviews each non-conformance to determine whether a form should be completed or not.

The use of the form ensures that the causes of nonconformities are determined and documented. The need for corrective action to ensure that nonconformities do not recur and the determination and implementation of action needed is documented on the form.

The record of implementation and the evaluation of the results of action taken are kept on the form as a quality record. The form also provides for the review and verification of the effectiveness of the corrective action taken.

Global Aviation Technologies will issue a corrective action request to a vendor when it is determined that the vendor is responsible for the root cause, using the CAR form.

If it is found that corrective actions are not closed in the times agreed to or that corrective actions are not effective, the Quality Management Representative will report those findings to top management. Top management will take direct action to ensure that the corrective action system integrity is not compromised.

8.5.3 Preventive Action Procedure

Global Aviation Technologies determines what action is required to eliminate the causes of potential nonconformities in order to prevent their occurrence. Preventive actions are appropriate to the magnitude of the potential problems. The procedure defining requirements for preventive action is shown below.

Proposed preventive actions are reported to the Quality Management Representative and/or Business Manager via Staff Meeting Minutes or the CAR Form.

Management will review preventive action status as necessary. GAT Management reviews each non-conformance to determine whether a form should be completed or not.

Management ensures that the causes of potential nonconformities are determined and documented as applicable. The need for preventive action to ensure that nonconformities do not occur and the determination and implementation of action needed may be documented on the form.

The record of implementation and the evaluation of the results of action taken are kept as a quality record (Staff Meeting Minutes). These results also provide for the review and verification of effectiveness of the preventive action taken.

If it is found that preventive actions are not closed in the time agreed to or that preventive actions are not effective, the Quality Management Representative will report those findings to top management. Top management will take direct action to ensure that the preventive action system integrity is not compromised.