



**VERMONT
AEROSPACE
INDUSTRIES, LLC**

966 Industrial Parkway P.O. Box 1148
Lyndonville, Vermont 05851 USA

QMSP- 4019 Counterfeit/Fraudulent Product

Rev.1.0

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Page 1 of 6

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Counterfeit Materials / Parts Prevention



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Page 2 of 6

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1.0 Purpose:

The purpose of this Material and Hardware instruction is to document the steps necessary to avoid, detect, mitigate, and disposition suspect counterfeit material/hardware. This process was developed to prevent counterfeit parts, and or materials from entering our customer's supply stream, thereby enabling the fulfillment of our customers' requirements, and continued customer satisfaction.

This work instruction establishes and documents counterfeit parts risk mitigation methods to enable:

- a. Maximizing the availability of authentic parts
- b. Procuring parts from reliable sources
- c. Avoiding \ mitigating the risks associated with procuring parts from independent distributors or brokers
- d. Assuring authenticity and conformance of procured parts
- e. Controlling parts identified as counterfeit
- f. Reporting counterfeit parts to other potential users and Government investigative authorities

This procedure was developed in support of customer requirements, AS6174 (Counterfeit Material; Assuring Acquisition of Authentic and Conforming Material).

2.0 Scope:

This procedure is applicable to all procured parts and materials that are used to manufacture any Vermont Aerospace Industries LLC part, sub assembly, assembly, or finished unit. This procedure shall be flowed down to all applicable Vermont Aerospace Industries LLC suppliers.

3.0 Objective:

The Objective of this procedure is to document a process for counterfeit avoidance in accordance with AS6174 section 3, and applicable customer requirements.



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Page 3 of 6

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4.0 References:

AS6174 Counterfeit Material; Assuring Acquisition of Authentic and Conforming Materials
AS9100 Quality Management System – Requirements for Aviation, Aerospace Model for
Quality Assurance in Defense Organization
QMSP-1001 Quality Manual
QMSP-840 Purchasing
QMSP-1034 Purchasing Info
QMSP-860 Release of Product
QMSP-1042 Control Nonconforming Product
QMSP-1020 Nonconformity and Corrective Action
QMSP-1086 Supplier Flow Down Requirements

5.0 Procedure \ Work Instructions:

For purposes of this procedure, the term “goods” consists of those commodities delivered that are the lowest level of separately identifiable items (e.g., articles, components, standard hardware, goods, raw materials, and assemblies).

"Counterfeit goods" is defined as

- a). Goods that are, or contains, items misrepresented as having been designed and/or produced under an approved system or other acceptable method.
- b). Goods that are an unauthorized copy or substitute of an Original Component Manufacturer (OCM)\Original Equipment Manufacturer (OEM).
- c). Goods that are not traceable to an OCM\OEM sufficient to ensure authenticity in OCM\OEM design.
- d). Goods that do not contain proper external or internal materials or components required by the OCM\OEM or are not constructed in accordance with OCM\OEM design.
- e). Goods that have been re-worked, re-labeled, repaired, refurbished as OCM\OEM authentic or new.
- f). Goods that have not passed successfully all OCM\OEM required testing, verification, screening, and quality control processes.



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Page 4 of 6

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The following instructions are the minimum requirements that shall be followed.

5.1 Requirements for Vermont Aerospace Industries LLC suppliers

5.1.1 Suppliers shall establish and maintain a Counterfeit Parts\Material Prevention and Control Plan using AS6174 (Reference elements of Section 3) to ensure that counterfeit goods are not delivered to Vermont Aerospace Industries LLC. The purpose of the control plan shall be to develop a robust process to prevent the delivery of counterfeit commodities and control commodities identified as counterfeit.

5.1.2 Suppliers shall only purchase products to be delivered or incorporated as goods to buyer directly from the Original Component Manufacturer (OCM)\Original Equipment Manufacturer (OEM), OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller. These products shall have verification that goods are traceable to OCM\OEM; OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. If Goods can only be acquired from independent distributors or brokers in cases of diminishing material supply (DMS) or obsolescence, written notice shall be provided to the Vermont Aerospace Industries LLC Quality Engineer and \or Supplier Quality Engineer and Buyer prior to procurement of these goods. After written approval by the customer, Vermont Aerospace Industries LLC, will receive the product from the supplier, goods shall be subjected to testing and screening process appropriate to the commodity (in accordance with AS6174) using an Vermont Aerospace Industries LLC approved third party laboratory. Records of evidentiary tests and inspections performed that ensure verification of the goods shall be provided to Vermont Aerospace Industries LLC for review and approval by Vermont Aerospace Industries LLC Quality Engineer and \or Supplier Quality Engineer prior to delivery. Written notice is not required for raw material and standard hardware purchased from independent distributors or brokers, but products must be able to provide commodity level traceability to the OCM\OEM.

5.1.3 Supplier shall provide written notification to Vermont Aerospace Industries LLC.

Quality Engineer and \or Supplier Quality Engineer and Buyer if supplier becomes aware or suspects that it has furnished Counterfeit Goods within 24 hours.

Supplier shall provide to Vermont Aerospace Industries LLC Quality Engineer and \or Supplier Quality Engineer and Buyer, upon request, the supply chain traceability to an Original Manufacturer or authorized distributor chain that identifies the name and



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Page 5 of 6

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location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. Supplier shall have a documented process in place to ensure Counterfeit goods are contained and do not reenter the supplier chain.

5.1.4 Supplier shall include this clause or equivalent provisions in lower tier subcontracts for the delivery of items that will be included in or furnished as goods to Vermont Aerospace Industries LLC as applicable.

5.1.5 Suppliers eligible for utilization of the Government-Industry Data Exchange Program ("GIDEP") shall utilize the GIDEP process to alert the industry of encountered counterfeit parts.

5.1.6 Supplier shall ensure their Counterfeit Avoidance program includes training of applicable personnel to the requirements within this procedure.

5.2 Requirements for Vermont Aerospace Industries LLC

5.2.1 Vermont Aerospace Industries LLC shall establish and maintain Counterfeit Part Risk Mitigation Control plan using AS6174 (Reference elements of Section 3) and (QMSP-1001),(QMSP-840),(QMSP-1042),(QMSP-1020),(QMSP-1086) to ensure that counterfeit goods are not delivered to Vermont Aerospace Industries LLC customers. The purpose of the control plan shall be to develop and maintain a robust process to prevent the delivery of counterfeit commodities and control commodities identified as counterfeit.

5.2.2 Vermont Aerospace Industries LLC shall only purchase products to be delivered or incorporated as goods to buyer or customer directly from the Original Component Manufacturer (OCM)\Original Equipment Manufacturer (OEM), OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller. These products shall have verification that goods are traceable to OCM\OEM; OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct



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Page 6 of 6

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source of the product. If Goods can only be acquired from independent distributors or brokers in cases of diminishing material supply (DMS) or obsolescence, written notice shall be provided to the Vermont Aerospace Industries LLC Quality Engineer and \or Supplier Quality Engineer prior to procurement of these goods by the Buyer. Quality Engineer and \or Supplier Quality Engineer shall review applicable customer requirements to ensure compliance. After written approval by Quality Engineer and \or Supplier Quality Engineer and Customer is received by the buyer, goods shall be subjected to a testing and screening process appropriate to the commodity (in accordance with AS6174) using an Vermont Aerospace Industries LLC approved third party laboratory. Records of evidentiary tests and inspections performed that ensure verification of the goods shall be provided to Quality Engineer and \or Supplier Quality Engineer for review and approval prior to delivery. Written notice is not required for raw material and standard hardware purchased from independent distributors or brokers, but products must be able to provide commodity level traceability to the Original Manufacturer.

5.2.3 Vermont Aerospace Industries LLC Quality Engineer shall notify customer within 24 hours if Vermont Aerospace Industries LLC becomes aware or suspects that it has furnished counterfeit goods. Format and method of communication shall be based on customer requirements.

5.2.4 Vermont Aerospace Industries LLC purchasing department shall include this clause or equivalent provisions in supplier contracts or purchase orders for the delivery of items that will be included in or furnished as goods.

5.2.5 Vermont Aerospace Industries LLC shall utilize the Government-Industry Data Exchange Program ("GIDEP") process to alert the industry of encountered counterfeit parts.

5.2.6 If counterfeit goods are discovered by Vermont Aerospace Industries LLC counterfeit goods shall contained and dispositioned in accordance with (QMSP-1042) and (QMSP-1020).

5.2.7 Counterfeit Avoidance program includes training of applicable personnel to this procedure.



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Page 7 of 6

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