**VIEWS AND INTERPRETATIONS** (2021 07 12)

Views and interpretations are issued via AAR QA Newsletter. All views and interpretations issued since 1985 have been reviewed and, where appropriate, have been added to Specification M-1003. Other interpretations are specific to a type of facility and do not affect all M-1003 Certified facilities; therefore they are issued here for reference. QA Newsletters will continue to contain pertinent views and interpretations between printings of M-1003 or issuance of AAR Circular Letter changes to M-1003.

Following is a summary, by program element, of the interpretations that have been rendered by the QA Committee. Please refer to these interpretations for guidance if questions arise. When new questions arise, please direct them to the QA Program Coordinator’s attention for further handling.

**1.0 ADMINISTRATIVE PROVISIONS (REFERENCE PARAGRAPH 2.1 IN THE SPECIFICATION)**

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**2.0 APPLICABILITY AND SCOPE (REFERENCE PARAGRAPH 2.2 IN THE SPECIFICATION)**

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**3.0 QA PROGRAM AND MANUAL REQUIREMENTS (REFERENCE PARAGRAPH 2.3 IN THE SPECIFICATION)**

The internal audit is a systematic review of the facility’s compliance to its QA manual and procedures.

The manual review is a systematic review of the facility’s QA manual for compliance to the specifications (e.g., M-1003 and any technical requirements).

The program review is a systematic review of all aspects of the quality program for compliance to all specifications—for example, customer requirements, technical requirements, nonconformance and corrective actions, preventive maintenance requirements.

Reviews noted above must be documented to comply with the M-1003 requirements.

**4.0 MANAGEMENT RESPONSIBILITY (REFERENCE PARAGRAPH 2.4 IN THE SPECIFICATION)**

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**5.0 PRODUCTION INSPECTION AND TEST PLAN (REFERENCE PARAGRAPH 2.5 IN THE SPECIFICATION)**

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**6.0 CORRECTIVE AND PREVENTATIVE ACTIONS (REFERENCE PARAGRAPH 2.6 IN THE SPECIFICATION)**

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**7.1 DOCUMENT CONTROL (REFERENCE PARAGRAPH 2.7 IN THE SPECIFICATION)**

7.2 M-1003 Certified companies are required to maintain current English language versions of applicable standards, internal procedures, and forms used in the quality program. With respect to completed forms, inspection and test results need not be translated into both English and the appropriate language; however a blank form in English must be available for use by the auditor.

**8.1 MEASURING AND TESTING EQUIPMENT (REFERENCE PARAGRAPH 2.8 IN THE SPECIFICATION)**

8.2 Shelf life of gauges: The facility must determine and document the shelf life of measuring and testing equipment based on the nature and use of the equipment, storage conditions, and all applicable specifications, technical requirements, contract requirements or manufacturers’ recommendations.

8.3 Placed-in-service dates are permissible on measuring and testing equipment provided the gauge calibration procedures support the practice and either

• there is evidence that the gauge is in the same condition when placed in service that it was when last calibrated; or

• the gauge meets the requirements of paragraph 8.1 above.

8.4 Placed-in-service dates are not permissible when technical requirements state otherwise.

8.5 In-service dates: Once a gauge is placed in service, the recalibration cycle or due date, as noted in the calibration procedure, is calculated from the date placed in service. Taking a gauge out of service and then placing it back in service with a new due date but without recalibrating it is not acceptable.

8.6 Welding machine output (amperage and/or voltage) must be verified using nationally recognized/traceable standards. Wire feed speed must be verified using nationally recognized/traceable standards or by verifying amperage and voltage when the facility’s equipment simultaneously controls wire feed speed and amperage. Records must be maintained to satisfy the requirements of paragraph 2.8 in the specification.

8.7 Shielding gas-flow devices do not require nationally recognized verification/calibration unless the product specification, contract, design requirements, or facility’s quality assurance program specifies verification/calibration.

8.8 Welding rod ovens: The facility must specify the method for verifying the oven temperature (temperature-indicating crayons are acceptable), provide documentation of the verification, and ensure that the AWS requirement or product specification for proper rod storage is satisfied. Verification methods other than the use of temperature-indicating crayons must satisfy the requirements of paragraph 2.8 in the specification.

8.9 – Cell Phone / Stop-Watch Calibration - Time measurement devices do not need to be calibrated. They must be in good working condition and have an appropriate scale for intended use.

8.10 Facilities are encouraged to request before-and-after readings on gauges sent in for calibration.

8.11 The user of a gauge must be aware of its calibration status. Access to the status should be at or near the work area.

8.12 When gauge tolerances are not specified in a technical specification, follow the manufacturer’s suggestion as a minimum.

8.13 In general, ‘reference’ gauges do not require calibration. This depends on the application of the gauge.

8.14 Paint-thickness gauges: Dry-film paint-thickness gauges must be calibrated using NIST or nationally recognized traceable standards. Wet-film paint-thickness gauges normally do not require calibration. These gauges are normally used as a guide or reference for the operator. If a contract requires that the wet-film thickness be verified as a quality characteristic, NIST or other nationally recognized traceable calibration may be required.

**9.0 PURCHASING AND CONTRACTING (REFERENCE PARAGRAPH 2.9 IN THE SPECIFICATION)**

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**10.0 INCOMING INSPECTION (REFERENCE PARAGRAPH 2.10 IN THE SPECIFICATION)**

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**11.0 IN-PROCESS INSPECTION (REFERENCE PARAGRAPH 2.11 IN THE SPECIFICATION)**

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**12.0 FINAL INSPECTION (REFERENCE PARAGRAPH 2.12 IN THE SPECIFICATION)**

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**13.0 INSPECTION STATUS (REFERENCE PARAGRAPH 2.13 IN THE SPECIFICATION)**

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**14.0 IDENTIFICATION AND TRACEABILITY (REFERENCE PARAGRAPH 2.14 IN THE SPECIFICATION)**

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**15.0 PROCESS CONTROL (REFERENCE PARAGRAPH 2.15 IN THE SPECIFICATION)**

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**16.0 PRESERVATION, PACKAGING, AND SHIPPING (REFERENCE PARAGRAPH 2.16 IN THE SPECIFICATION)**

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**17.0 QUALITY RECORDS (REFERENCE PARAGRAPH 2.17 IN THE SPECIFICATION)**

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**18.0 NONCONFORMANCE CONTROL (REFERENCE PARAGRAPH 2.18 IN THE SPECIFICATION)**

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**19.0 QUALITY PROGRAM REVIEW AND MANUAL REVISION (REFERENCE PARAGRAPH 2.19 IN THE SPECIFICATION)**

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**20.0 PROCESS CAPABILITY/STATISTICAL METHODS (REFERENCE PARAGRAPH 2.20 IN THE SPECIFICATION)**

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**21.0 INTERNAL AUDIT (REFERENCE PARAGRAPH 2.21 IN THE SPECIFICATION)**

21.2 An AAR auditor may write an adverse audit finding report, even if the nonconformance was found in the internal audit, if the auditor also found the nonconformance and it has not been corrected.

21.3 Auditing internal audits should be done in such a manner as to not give the perception that the auditor is using the internal audit results to conduct his or her audit.

21.4 A completed checklist is one that has checkmarks (or other notations) that indicate an element was audited and notes that describe what you looked at and what you found. The notes do not have to be on the checklist but they need to exist and should be filed with the checklist.

**22.1 TRAINING (REFERENCE PARAGRAPH 2.22 IN THE SPECIFICATION)**

Evaluate the effectiveness of the people trained. This may be done in a variety of ways, including but not limited to the following:

• written or oral examination

• observation of work being performed

• documented lack of problems with the work

• verification of a nonconformance corrective action where training was the root cause of the nonconformance

**23.0 CONTRACT REVIEW (REFERENCE PARAGRAPH 2.23 IN THE SPECIFICATION)**

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**24.1 DESIGN CONTROL (REFERENCE PARAGRAPH 2.24 IN THE SPECIFICATION)**

24.2 If a function within the design control process is performed at a different location (e.g., “headquarters”), the QA manual shall clearly describe which criteria of the design control process are performed at the different location.