



AEROSPACE RECOMMENDED PRACTICE

ARP6328™**REV. A**Issued 2016-09
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Superseding ARP6328

(R) Guideline for Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts;
Avoidance, Detection, Mitigation, and Disposition Systems

RATIONALE

Revision A of this document reflects the changes made through AS5553 Revision D. This document is a major revision which provides updated effective guidance for personnel training, supplier assessment, purchasing processes, procurement risk assessment, counterfeit risk mitigation, supplier requirements flow down, purchased part verification, investigation, material traceability, suspect counterfeit and counterfeit part control, reporting and auditing. Guidance information from early revisions of AS5553 is retained and updated to be consistent with contemporary good practices.

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<https://www.sae.org/standards/content/ARP6328A/>

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Document Sharing Hub

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1. SCOPE

The content of ARP6328 contains guidance for implementing processes used for risk identification, mitigation, detection, avoidance, disposition, and reporting of counterfeit electrical, electronic, and electromechanical (EEE) parts and assemblies in accordance with AS5553 Revision D. This document may also be used in conjunction with other revisions of AS5553. This document retains guidance contained in the base document of AS5553, updated as appropriate to reflect current practices. This is not intended to stand alone, supersede, or cancel requirements found in other quality management system documents, requirements imposed by contracting authorities, or applicable laws and regulations unless an authorized exemption/variance has been obtained.

2. REFERENCES

2.1 Applicable Documents

The following publications form a part of this document to the extent specified herein. The latest issue of SAE publications shall apply. The applicable issue of other publications shall be the issue in effect on the date of the purchase order. In the event of conflict between the text of this document and references cited herein, the text of this document takes precedence. Nothing in this document, however, supersedes applicable laws and regulations unless a specific exemption has been obtained.

Counterfeiting is not a static process. As industry devises new methods to identify counterfeit EEE parts, counterfeiters develop new methods to disguise their parts. In an effort to keep ahead of the evolution of counterfeiting, the SAE, in addition to other industry organizations, continues to develop new and/or revised standards to mitigate the risk of use of counterfeit EEE parts.

The lists below contain documents offered as additional resources. Not all the documents in the following sections are referenced in the body of this ARP.

2.1.1 SAE Publications

Available from SAE International, 400 Commonwealth Drive, Warrendale, PA 15096-0001, Tel: 877-606-7323 (inside USA and Canada) or +1 724-776-4970 (outside USA), www.sae.org.

AIR6273	Terms, Definitions, and Acronyms, Counterfeit Materiel or Electrical, Electronic, and Electromechanical Parts
ARP6178	Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Tools for Risk Assessment of Other than an Authorized Source (e.g., Independent Distributors)
ARP9009	Aerospace Contract Clauses
AS5553	Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition
AS6081	Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Avoidance, Detection, Mitigation, and Disposition - Independent Distribution
AS6171	Test Methods Standard; General Requirements, Suspect/Counterfeit, Electrical, Electronic, and Electromechanical Parts
AS6171/2	Techniques for Suspect/Counterfeit EEE Parts Detection by External Visual Inspection, Remarking and Resurfacing, and Surface Texture Analysis Using SEM Test Methods
AS6171/3	Techniques for Suspect/Counterfeit EEE Parts Detection by X-Ray Fluorescence Test Methods
AS6171/4	Techniques for Suspect/Counterfeit EEE Parts Detection by Delid/Decapsulation Physical Analysis Test Methods

AS6171/5	Techniques for Suspect/Counterfeit EEE Parts Detection by Radiological Test Methods
AS6171/6	Techniques for Suspect/Counterfeit EEE Parts Detection by Acoustic Microscopy (AM) Test Methods
AS6171/7	Techniques for Suspect/Counterfeit EEE Parts Detection by Electrical Test Methods
AS6171/8	Techniques for Suspect/Counterfeit EEE Parts Detection by Raman Spectroscopy Test Methods
AS6171/9	Techniques for Suspect/Counterfeit EEE Parts Detection by Fourier Transform Infrared Spectroscopy (FTIR) Test Methods
AS6171/10	Techniques for Suspect/Counterfeit EEE Parts Detection by Thermogravimetric Analysis (TGA) Test Methods
AS6171/11	Techniques for Suspect/Counterfeit EEE Parts Detection by Design Recovery Test Methods
AS6301	Compliance Verification Criterion Standard for SAE AS6081, Fraudulent/Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, and Disposition - Distributors
AS6462	AS5553C, Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition Verification Criteria
AS6496	Fraudulent/Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, and Disposition - Authorized/Franchised Distribution
AS9003	Inspection and Test Quality Systems Requirements for Aviation, Space, and Defense Organizations
AS9100	Quality Management Systems - Requirements for Aviation, Space, and Defense Organizations
AS9120	Quality Management Systems - Requirements for Aviation, Space, and Defense Distributors
AS13000	Problem Solving Requirements for Suppliers
EIA-STD-4899	Requirements for an Electronic Components Management Plan
EIA-933	Requirements for a COTS Assembly Management Plan
STD-0016	Standard for Preparing a DMSMS Management Plan

2.1.2 ISO/IEC Publications

Available from International Organization for Standardization, ISO/IEC Central Secretariat, 1, ch. de la Voie-Creuse, CP 56, CH-1211 Geneva 20, Switzerland, Tel: +41 22 749 01 11, www.iso.org.

IEC 60748-11-1	Semiconductor devices - Integrated circuits - Part 11-1: Internal visual examination for semiconductor integrated circuits excluding hybrid circuits
IEC 60749-3	Semiconductor devices - Mechanical and climatic test methods - Part 3: External visual examination
IEC 60749-16	Semiconductor devices - Mechanical and climatic test methods - Part 16: Particle impact noise detection (PIND)

IEC 60749-19	Semiconductor devices - Mechanical and climatic test methods - Part 19: Die shear strength
IEC 60749-22	Semiconductor devices - Mechanical and climatic test methods - Part 22: Bond strength
IEC 62239-1	Process management for avionics - Management plan - Part 1: Preparation and maintenance of an electronic components management plan
IEC TS 62239-2	Process management for avionics - Management plan - Part 2: Preparation and maintenance of an electronic COTS assembly management plan
IEC 62402	Obsolescence management
ISO 9000	Quality management systems - Fundamentals and vocabulary
ISO 9001	Quality management systems - Requirements
ISO/IEC 17025	General requirements for the competence of testing and calibration laboratories

2.1.3 ANSI Accredited Publications

Copies of these documents are available online at <https://webstore.ansi.org/>.

ANSI/ASQ E4	Quality systems for environmental data and technology programs - Requirements with guidance for use
ANSI/ESD S20.20	Protection of Electrical and Electronic Parts, Assemblies and Equipment (Excluding Electrically Initiated Explosive Devices)

2.1.4 U.S. Government Publications

U.S. Government specifications, standards and information about DoD-adopted specifications and standards is available from the Acquisition Streamlining and Standardization Information System (ASSIST) at <https://quicksearch.dla.mil>.

DFARS 252.246-7007	Contractor Counterfeit Electronic Part Detection and Avoidance System
DFARS 252.246-7008	Sources of Electronic Parts
DoDI 4245.15	Diminishing Manufacturing Sources and Material Shortages Management
MIL-PRF-19500	Semiconductor Devices, General Specification For
MIL-PRF-38535	Integrated Circuits (Microcircuits) Manufacturing, General Specification For
MIL-STD-3018	Parts Management
SD-19	Parts Management Guidebook
SD-22	Diminishing Manufacturing Sources and Material Shortages (DMSMS) Guidebook

2.1.5 United Kingdom Ministry of Defence Publications

Available from www.defencegateway.mod.uk/

JSP 886	Defence Logistics Support Chain Manual
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2.1.6 ASME Publications

Available from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, NJ 07007-2900, Tel: 800-843-2763 (U.S./Canada), 001-800-843-2763 (Mexico), 973-882-1170 (outside North America), www.asme.org.

ASME NQA-1 Quality Assurance Requirements for Nuclear Facility Applications

2.1.7 Components Technology Institute Publications

Available from Components Technology Institute, Inc., 211 Homewood Dr., Huntsville, AL 35801, Tel: +1-256-651-1551, www.cti-us.com

CCAP-101 Counterfeit Components Avoidance Program, Certification for

2.1.8 IDEA Publications

Available from IDEA, 2250 Double Creek Dr #6474, Round Rock, TX 78683-0061, Tel: +1 (714) 670-0200, <https://idofea.org/>

IDEA-STD-1010 Acceptability of Electronic Components Distributed in the Open Market

2.1.9 JEDEC Publications

Available from JEDEC, 3103 North 10th Street, Suite 240-S, Arlington, VA 22201-2107, www.jedec.org

JEDEC JESD31 General Requirements for Distributors of Commercial and Military Semiconductor Devices

2.2 Related Publications

The following publications are provided for information purposes only and are not a required part of this SAE Technical Report.

2.2.1 U.S. Government Publications

U.S. Government specifications, standards and information about DoD-adopted specifications and standards is available from the Acquisition Streamlining and Standardization Information System (ASSIST) at <https://quicksearch.dla.mil>.

MIL-PRF-38534 Hybrid Microcircuits, General Specification For

MIL-STD-202 Electronic and Electrical Component Parts

MIL-STD-750 Test Methods for Semiconductor Devices

MIL-STD-790 Established Reliability and High Reliability Qualified Products List (QPL) Systems for Electrical, Electronic, and Fiber Optic Parts Specification

MIL-STD-883 Test Method Standard - Microcircuits

MIL-STD-1580 Destructive Physical Analysis for Electronic, Electromagnetic, and Electromechanical Parts

DoDI 4140.67 DoD Counterfeit Prevention Policy

2.2.2 United Kingdom Ministry of Defence Publications

Available online from www.defencegateway.mod.uk/.

DEF STAN 05-135 Avoidance of Counterfeit Materiel

2.2.3 JEDEC Publications

Available from www.jedec.org.

JEDEC JESD22-B107 Marking Permanency

2.2.4 RTCA Publications

Available from RTCA, Inc., 1150 18th Street, NW, Suite 910, Washington, DC 20036, Tel: 202-833-9339, www.rtca.org.

DO-254 Design Assurance Guidance for Airborne Electronic Hardware

2.2.5 IEC Publications

Available from IEC Central Office, 3, rue de Varembe, P.O. Box 131, CH-1211 Geneva 20, Switzerland, Tel: +41 22 919 02 11, www.iec.ch.

IEC 62668-1 Process management for avionics - Counterfeit prevention - Part 1: Avoiding the use of counterfeit, fraudulent and recycled electronic components

IEC 62668-2 Process management for avionics - Counterfeit prevention - Part 2: Managing electronic components from non-franchised sources

2.2.6 IAQG Publications

Available from IAQG, Boulevard A. Reyers 80 à, Bruxelles, 1030, Belgium, www.iaqg.org/scmh.

IAQG SCMH 3.5.2 Counterfeit Parts Prevention Guidance

2.3 Terms and Definitions

Throughout the text of this document, wherever the term “product” occurs, it can also mean service.

For the purposes of this document, the terms and definitions listed in ISO 9000, AS5553D, AIR6273, and the following apply:

2.3.1 Related Definitions

2.3.1.1 CERTIFICATION

The certification body action of testifying, guaranteeing, or endorsing organizations that conform with specific management systems standards.

2.3.1.2 OPEN MARKET

The trading market that buys or consigns excess inventories of parts and subsequently utilizes these inventories to ultimately fulfill the supply needs of an end user.

NOTE: The open market may include the purchase and sale of parts where the full supply chain traceability of such parts is unknown.

2.3.1.3 PACKAGE

The body of a component, such as flat-pack or dual-in-line package.

2.3.1.4 PACKAGING

The container or enclosure of parts for distribution, storage, or sale.

NOTE: Packaging selection is determined by product sensitivities such as moisture, physical (lead pitch, co-planarity), electrostatic discharge (ESD), as well as the method (manually, or by use of automated equipment) to be used to place parts on the printed circuit board. Packaging can include various forms of device packaging materials such as corrugated containers (boxes), JEDEC Trays, integrated circuit carriers, tubes/sticks, moisture barrier bags, static shielding bags, tape and reel, conductive carriers, dunnage, and thermoformed vacuum formed or injection molded trays. Packaging accessories include humidity indicator cards, desiccant, antistatic packing material, and proper labels.

3. GUIDANCE

3.1 Counterfeit EEE Parts Control Plan

This section provides guidance to develop and implement a counterfeit EEE parts control plan for risk identification, mitigation, detection, avoidance, disposition, and reporting of suspect counterfeit or counterfeit EEE parts and/or assemblies containing such EEE parts. These controls are intended to be risk-based and to reduce the likelihood of suspect counterfeit or counterfeit EEE parts being procured and/or installed in products delivered to end customers. The organization should maintain awareness of current counterfeiting information and update its processes based on observed trends. The organization may include EEE anti-counterfeit processes in a comprehensive all commodity plan or its plan may identify separate instructions or procedures provided that it addresses all the requirements in AS5553.

3.1.1 Personnel Training

AS5553 requires personnel to receive training appropriate to their counterfeit prevention role and/or function. The organization should also plan refresher training on an appropriate frequency. This section lists guidance for training contents by job function. Training should cover the awareness, avoidance, detection, mitigation, and disposition of suspect counterfeit or counterfeit EEE parts, as appropriate for the functional role. Periodic updates to training content should address changing trends in counterfeit parts, their avoidance, and new detection methods. Training records should be maintained per company quality management procedures. Some examples of counterfeit prevention training to be considered for applicable functions based on their specific responsibilities are as follows.

- a. Management, Program and Project Management and Contracts: Awareness of company policies on counterfeit prevention regulatory and standards requirements, and counterfeit threats.
- b. Procurement: Understanding of critical role in procuring EEE parts from authorized sources or exclusive suppliers (see 3.1.3.1), and the process required when parts are not acquired from these sources.
- c. Customer Interface: Awareness and job-specific actions relating to counterfeit prevention during auditing, contracting, marketing, and/or field service.
- d. Quality Assurance: Understanding of role in preventing, auditing, containment, disposition and reporting of counterfeit part incidents, and assuring customer requirements and company procedures are followed.
- e. Inspection and Receiving: How to conduct effective inspection and testing for counterfeit detection, verify proper documentation for purchased and returned parts, physical characteristics for indications of counterfeit EEE parts, test/inspection results; packaging, and paperwork to identify suspect parts.
- f. Manufacturing: General counterfeit part awareness and the inventory, kitting, and production controls necessary to assure proper traceability of parts, including any special requirements to control parts in inventory and production.
- g. Engineering: Counterfeit parts risk; mitigation test/inspections; verification of test/inspection results; and their role in engineering design for counterfeit avoidance and obsolescence management, minimizing the risk of purchasing parts from unauthorized sources, and securing alternate authorized sources.

3.1.2 EEE Parts Availability

The organization's counterfeit control plan should document processes that maximize the use of available, authentic, originally designed, and qualified EEE parts throughout the product's life cycle.

During design, proposal, and program planning efforts, organizations should assess the long-term availability of authentic parts and part sources for production and support of systems. When assessments indicate availability risks, organizations should implement risk mitigation efforts throughout the product's life cycle to reduce exposure to counterfeit EEE parts, including, for example:

- a. planning for adequate procurement lead times;
- b. alternate/multiple sources;
- c. lifetime or bridge buy from original component manufacturer or its authorized sources;
- d. substitutions;
- e. system/subsystem/component redesign;
- f. EEE parts obsolescence management and mitigation.

Obsolescence can increase the risk of acquiring counterfeit EEE parts. Obsolescence management throughout the product life cycle is a key driver for counterfeit avoidance, and it is essential for minimizing the risk of purchasing EEE parts from unauthorized sources. To reduce the likelihood of purchasing counterfeit EEE parts, equipment manufacturers should proactively manage the life cycle of EEE parts contained within their products through the use of an obsolescence management plan or Diminishing Manufacturing Sources and Material Shortages (DMSMS) management plan. It is recommended that the organization engage customers when obsolescence risks are identified. Jointly consider alternate resolutions to address obsolescence risk.

There are industry-recognized obsolescence part management services that can be used to aid in the mitigation of counterfeit parts.

Appendix B contains examples of government and industry documents which provide guidance about part obsolescence management.

3.1.3 Purchasing Process

3.1.3.1 The organization can reduce its risk of obtaining counterfeit parts by purchasing EEE parts directly from any of the following.

- a. Original component manufacturers (OCM)/original equipment manufacturers (OEM).
- b. OCM-authorized sources of supply for a EEE part (i.e., franchised distributors, authorized distributors).
- c. Authorized aftermarket manufacturers.
- d. Exclusive suppliers (refer to definition in AS5553D).

3.1.3.1.1 The organization should purchase EEE parts from these sources when the parts are still being manufactured or the parts are currently available in stock from these sources.

3.1.3.1.2 According to AS5553, a EEE part that is still being manufactured (by the original manufacturer or an authorized aftermarket manufacturer) must be procured from an authorized source or an exclusive supplier. If a part is in production but not available in stock directly from these sources (e.g., due to lead time), then AS5553 does not allow the part to be obtained from a supplier other than an authorized source or exclusive supplier. If AS5553 compliance is required by a contract, then customer approval would be required to allow the EEE part to be procured from another type of supplier. If AS5553 is not on contract, but the organization's quality management system requires compliance to AS5553, then the organization should address such a procurement within its quality management system, for example, as a discrepancy with corrective action or as a documented exception within its quality management system. To determine whether a EEE part is being manufactured, the organization should perform one or more of the following.

- a. Contact the OCM/OEM, Authorized Distributor, or Authorized Aftermarket Manufacturer, or reference their websites.
- b. Search for end-of-life (EOL) notifications, product change notifications, or other notifications that announce termination of production.
- c. Use a subscription service (i.e., a data provider) to monitor production status.

3.1.3.1.3 If a EEE part is not being manufactured, the organization should maintain objective evidence of the part's production status in the organization's records.

3.1.3.1.4 After production has ceased, a EEE part may remain available in stock from the OCM/OEM, authorized distributor, or authorized aftermarket manufacturer.

3.1.3.1.5 Some customer contracts impose additional constraints to procure EEE parts from sources other than those listed in 3.1.3.1 when the parts are in production (e.g., DFARS 252.246-7008). It is recommended the organization contact the OCM/OEM and authorized aftermarket manufacturer (if any) to confirm whether the parts are still being manufactured. If the parts are still being manufactured, but not available in stock from a source listed in 3.1.3.1, then a good practice for the organization is to engage its customer in the decision whether to purchase from a source other than those listed in 3.1.3.1.

NOTE: Authorized sources are the OCM/OEM and OCM/OEM-authorized sources of supply for an EEE part (i.e., franchised distributors, authorized distributors), and authorized aftermarket manufacturers.

3.1.3.1.6 OCM authorized distribution agreements typically include provisions that protect the user by ensuring product integrity and supply chain traceability, such as:

- a. OCM/OEM warranty;
- b. proper handling, storage, and shipping procedures;
- c. failure analysis and corrective action support;
- d. certificates of conformance and acquisition supply chain traceability.

3.1.3.1.6.1 An authorized distributor provides an EEE part acquired through an authorized distribution agreement with the OCM. Contractual agreement terms may include, but are not limited to, distribution region, distribution products or lines, and warranty flow down from the manufacturer.

NOTE: In some parts of the world (such as where IEC 62668-1 is utilized), manufacturers many use the terms "franchise" and "authorize" differently. In those parts of the world, manufacturers franchise distribution of their product and authorize manufacturing by other entities. For the purposes of this document, franchised distribution is considered synonymous with authorized distribution.

- 3.1.3.1.6.2 When a distributor that typically acts as an authorized distributor provides an EEE part from outside of an authorization distribution agreement, then for the purpose of this document, the distributor is considered a non-authorized source for the part and managed per 3.1.3.5. Counterfeit risk increases when a distributor obtains product through multiple intermediaries (regardless of having traceability to the OCM), if any of the intermediaries are not an authorized distributor.
- 3.1.3.2 The organization should determine whether its sources are properly categorized for intended purchases. For example, the organization can review reputable information, such as the manufacturer's webpage or part specification, to assure a source is the original manufacturer of parts being purchased. The organization may contact the original manufacturer or reference a list of authorized distributors on the manufacturer's website to assure the intended supplier is an OCM/OEM-authorized source. authorized aftermarket manufacturers should have authorization from the OCM/OEM to produce or distribute the EEE part being purchased.
- 3.1.3.2.1 To assure an exclusive supplier provides EEE parts obtained exclusively from OCMs/OEMs, OCM/OEM-authorized sources, or authorized aftermarket manufacturers, the organization can review traceability documentation or other objective evidence that the supplier obtains EEE parts directly from such sources.
- 3.1.3.2.2 In accordance with its documented record retention requirements, the organization should maintain objective evidence of the basis for categorizing all sources of EEE parts. Examples of objective evidence are correspondence from the OCM/OEM; a screen shot (including the date) of an OCM's/OEM's webpage that lists authorized distributors; or an established process that assures accurate categorization of sources.

NOTE: The manufacturer's website may not always reflect recent additions or deletions to the manufacturer's authorized distributor list. Also, some manufacturers may limit what parts their authorized distributor can sell. For example, a manufacturer may allow a distributor to sell parts for use in a commercial application, or for engineering evaluation, but may not allow the same parts to be sold for military or other high reliability applications. Therefore, if the manufacturer's website information is doubtful or lacking, contact the manufacturer directly.

NOTE: Some sources may present themselves as an OCM/OEM, but instead they rebrand, remark, reassemble, repackage, refurbish, or upcycle parts designed/built by other OCMs/OEMs. These sources can be referred to as replacement part sources or replacement part manufacturers. They apply their own part numbers and/or branding to parts. The performance and reliability of these parts may not be well characterized or fully disclosed. The organization should follow a rigorous part substitution, qualification, and supplier evaluation process in accordance with its parts management plan to avoid use of potentially nonconforming parts.

3.1.3.3 Guidance for the Organization to Establish a Process to Review, Audit, and/or Evaluate Exclusive Suppliers

3.1.3.3.1 An exclusive supplier should only deliver EEE parts to customers that the supplier obtained directly from the OCM or its authorized sources. The organization should flow down appropriate requirements to an exclusive supplier.

3.1.3.3.2 The organization should verify:

- a. The supplier has a process to identify the OCM and its authorized sources.
- b. EEE part purchases are directly from the OCM or authorized sources.

NOTE: Examples of methods to identify the OCM of a part are identification on the part drawing or specification; qualified manufacturer's list; purchasing agreement; or confirmation by the OCM or the organization. OCMs and their authorized sources may change due to acquisitions and other business adjustments, so they should be reverified if the part is re-procured over time. If necessary, contact the current OCM or the authorized source for confirmation or objective evidence that the source was authorized by the OCM at the time of procurement.