

<b>SUSPECT/COUNTERFEIT ITEMS – AVOIDANCE, DETECTION, MITIGATION AND DISPOSITION PROCEDURE</b>	<b>ISSUE DATE: 08/15/12</b>
<b>DP Q3400</b>	<b>REV. DATE: 05/04/18</b>
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**DEPARTMENT PROCEDURE**

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**1.0 REVISION HISTORY**

REVISION LEVEL	DATE	DESCRIPTION OF CHANGE	ECO #
-	08-15-12	Original Issue	
A	05-04-18	Complete re-write.	18-017

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**2.0 PURPOSE:**

The purpose of this procedure is to outline the necessary avoidance, detection, mitigation, and disposition processes to prevent counterfeit parts, especially electrical, electronic and electromechanical components (EEE), from entering customers’ supply stream, to fulfill customers’ requirements and continued customer satisfaction.

**3.0 SCOPE:**

This document provides requirements, practices and methods to mitigate the risks of receiving counterfeit electronic parts. It also specifies requirements for suppliers’ counterfeit risk mitigation and control plan and applies to all levels of procurement of electronic parts and associated material management, inspection and test.

**4.0 POLICY:**

This policy applies to all electronic components and parts delivered to Antcom, either in circuit card assemblies or as individual components. Antcom suppliers are required to purchase from OCM, OEM, or authorized distributors for such OCM/OEM, as sole and exclusive sources for all Electronic Assemblies, components or parts to be delivered to Antcom and to obtain and retain written records for such.

**5.0 REFERENCE:**

- SP Q300            Quality Policy Manual
- AS5553           Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition
- DP Q3100        Purchased Material Quality
- DP Q3120        Incoming Inspection Procedure
- DP Q3500        Control of Non-Conforming Material
- DP Q3700        Corrective Action Plan
- SQR Q9000      Supplier Quality Requirements
- Antcom’s Department Responsibilities and Procedures

**6.0 DEFINITION:**

6.1 Suspect Part – A part in which there is an indication by visual inspection, testing, or other information indicating the item may have been misrepresented by the external provider or manufacturer and may in turn meet the definition of a Counterfeit Part.

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6.2 Counterfeit Part – A suspect part identified as a copy or substitute without the legal right or authority to do so or a part whose material, performance, or characteristics are knowingly misrepresented by an external provider in the supply chain, including the lowest level of separately identifiable items. Counterfeit Part include but are not limited to:

- Parts not containing the proper internal construction that is consistent with the desired, producer, or ordered part
- Used, refurbished, or reclaimed parts represented as new product.
- Parts with a different package style, type, or surface plating / finish than the required or order product.
- Parts not successfully completing the full production and / or test flow of the Original Component Manufacturer (OCM) or Original Equipment Manufacturer (OEM) that are represented as completed product.
- Parts sold or delivered with modified labeling or markings intended to misrepresent the form, fit, function, or grade of the intended product.

6.3 Aftermarket Manufacturer - A manufacturer meeting one or more of these criteria

- A manufacturer authorized by the OCM / OEM to produce or provide replacement parts. The parts supplied are produced from originating from the OCM / OEM to the aftermarket
- Manufacturer or parts produced by an aftermarket manufacturer using the OCM / OEM tooling or intellectual property.
- The manufacturer produces parts using tooling or equipment manufactured by and traceable to an OCM / OEM that was properly stored until use. The parts are subsequently assembled, tested, and qualified using processes meeting the technical specifications without violating the intellectual property rights, patents, or copyrights of the OCM / OEM.

Note: The Aftermarket manufacturer must label or otherwise identify the parts to ensure the “as shipped” product is not mistaken for the product manufactured by the OCM / OEM.

6.4 Approved Suppliers - External providers who are formally assessed and determined to have a low risk of providing counterfeit product.

Approved Distributor – A distributor, approved by document from OEM/OCM, that provides OEM/OCM products to customer.

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6.5 Authorized Supplier - Aftermarket manufacturers and OCM / OEM authorized sources of supply for a specific part.

6.6 Certificate of Conformance (C of C) - A document provided by the external provider formally declaring the purchase order requirements are met. The document may include information relative to the manufacturer, distributor, Quantity, date code, inspection date that is signed by a responsible associate for the external provider.

**7.0 RESPONSIBILITY:**

Purchasing, Engineering, QA and other associates as appropriate or required are responsible to comply with the requirements and processes identified in this document.

7.1 Purchasing is responsible to procure the correct part using the applicable drawing, specification, description, or other information.

7.2 Engineering is responsible to ensure the drawing, specification, process, or description identifies the applicable type, class, style, part number, manufacturer, or other related information so the correct part or product is identified.

7.3 Receiving Inspection/QA is responsible to examine, inspect, and/or maintain the parts to identify or mitigate the receipt and/or use of counterfeit parts.

**8.0 PROCEDURE:**

8.1 Planning, Engineering and Purchasing shall assess the availability of original or authentic product in support of manufacturing. To reduce the risk associated with counterfeit parts lifetime buys, multiple supply sources, and part substitutions may be considered.

8.2 Purchasing shall examine a potential source of supply to assess the risk of receiving counterfeit parts. Assessment may be a check against the Approved Supplier List (ASL), survey, audit, product alert review, and a review of the external provider quality data to determine performance.

8.3 Purchasing must maintain a list of approved suppliers to minimize the risk associated with the supply and / or receipt of counterfeit parts.

8.4 Purchasing should focus buying efforts to obtain parts directly from a Manufacturer, approved distributor, authorized resell organization, or franchised aftermarket supplier.

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- 8.5 Purchasing shall ensure that approved sources of supply are maintaining effective processes for mitigating the risks of supplying counterfeit parts. At a minimum, the supplier should be required to provide certificates of conformance and acquisition traceability. These certification requirements must be clearly identified on the purchase document as deliverable data.
- 8.6 Purchasing must specify the flow down requirements from this procedure applicable to the supplier or subcontractor. Purchasing must perform some level of risk assessment if the supplier or subcontractor does not maintain a documented counterfeit part control plan.
- 8.7 The PO must specify the applicable requirements to the supplier to minimize the risk of receiving counterfeit parts. To minimize the risk of procuring counterfeit parts the purchase order should include requirements to ensure conformance, and authentic parts are provided. The purchase order will also list certification or traceability requirements, test and / or inspection results and Quality System requirement for the supplier.
- 8.8 Incoming QA must examine the part to ensure the drawing, specification, type, class, style, part number, manufacturer, Certificate of Conformance or other related information is present to detect or identify suspect or counterfeit parts. Suspected or identified counterfeit parts shall be documented as nonconforming as per DP Q3500 Control of Nonconforming Material and be quarantined in MRB location. A supplier corrective action request (SCAR) shall be issued in accordance with DP Q3700 Corrective Action Plan.
- 8.9 Top Management is responsible to determine how the counterfeit part occurrence is reported internally, to customers, to the Government, the Government Cooperative (GIDEP), other industry reporting programs (ERAI), and related authorities.

**9.0 VERIFICATION:**

9.1 Verification may include as applicable:

- Obtaining objective evidence of the quality of the product from suppliers through documentation, certificate of conformity, test reports etc.
- Inspection or audit at the suppliers' premises
- Review of required documentation
- Visual inspection of products under 10X minimum magnification.
- XRF verification (all electrical components)
- Delegation of verification to the supplier or supplier certification.
- X-ray, non-destructive evaluation and testing


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**10.0 APPROVALS:**

  
\_\_\_\_\_  
QA Manager

  
\_\_\_\_\_  
Purchasing Manager

  
\_\_\_\_\_  
CE - Engineering

  
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OPS/Materials Manager