



COUNTERFEIT PARTS PREVENTION PROGRAM

1.0 SCOPE

1.1 Outline the procedure for the counterfeit parts prevention program utilized by B&B Specialties / GS Aerospace to assure that no counterfeit product enters the market.

2.0 OWNER

2.1 The Quality Manager has the responsibility for assuring that this process is enforced and maintained.

3.0 DEPARTMENTS AFFECTED

Engineering – Tooling		Quality – Inspection	X	Manufacturing - Heading	X	Manf. Support – Tool Crib		Sales and Marketing	x
Engineering – Product		Quality – Laboratory	X	Manufacturing – Secondaries		Shipping / Receiving	X	Human Resources	
Engineering – Manufacturing	x	Quality – NDT	X	Manufacturing – Grind		Production Control	X	Business Systems	
Engineering Estimating		Quality – Doc. Cntrl.	x	Manufacturing – Fillet Roll		Maintenance		Management	x
		Quality - Engineering	x	Manufacturing – Thread Roll				Finance	

4.0 REFERENCES

- 4.1 WI-500-05 Scrap Disposal
- 4.2 WI-600-01 Raw Material and Process Purchasing
- 4.3 WI-902-48 Manufacturing Control

5.0 PROCEDURE

- 5.1 B&B Specialties / GS Aerospace does not consider any assembly operations or multi piece fasteners to be within the company’s core competency and, therefore, B&B receives no components into our inventory.
- 5.2 All product shipped by the company is manufactured from raw material at the Anaheim Facility.
 - 5.2.1 All raw material is purchased from Approved Vendors.
- 5.3 The company performs a risk assessment to determine the risks associated with counterfeit product being either received and utilized in the manufacturing of product or counterfeit or non-compliant products escaping into the aerospace supply chain.
- 5.4 Per the results of the risk assessment (Appendix A to this Work Instruction), the following controls have been put in place. These controls constitute the company’s Counterfeit Parts Prevention Program.
- 5.5 The Company does not purchase finished product for resale to meet customer requirements.
- 5.6 All raw material received by the company is inspected per WI-600-01. This inspection includes a review of the Raw Material certification and alloy verification inspection using XRF analysis.
 - 5.6.1 Traceability of raw material lot is maintained throughout the life of the product.

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- 5.6.2 The company purchases raw material from material melted in compliance with DFAR 252.225-7014 Alt 1 per WI-600-01 and Quality Clause Q6.
- 5.7 All product is head marked with the registered head marking of the company at initial forming.
 - 5.7.1 If head marking is moved to a secondary head marking operation via a non-standard routing due to tooling constraints, all product is inspected for head marking prior to final acceptance.
- 5.8 Lot Traceability is maintained throughout the production process per WI-902-48.
 - 5.8.1 Lot quantity is controlled via Visual-ERP. Quantity gains and losses greater than that allowed per WI-902-48 requires Quality Manager signature prior to final acceptance.
- 5.9 Non-Conforming Material is controlled per WI-500-28.
- 5.10 All scrap products are controlled per WI-500-05 which includes a certified product destruction. This scrap destruction assures that non-conforming product produced by the company doesn't enter the supply chain.
- 5.11 After final acceptance, all product is received into inventory with Lot traceability
- 5.12 All product is shipped with a Certification of Conformance and any certifications required by the customer.
- 5.13 Manufacturing and Inspection and Test records are maintained per QP 4.2.4.

6.0 REVISION AND CHANGE CONTROL

Written by:	Brad Hightower	Date:	10/15/98
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Revision	Description	Date	Approval
A	Initial Release	7/23/2012	Brad Hightower

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WORK INSTRUCTION

Appendix A – Counterfeit Parts Risk Assessment

Process Step / Process	Process Purpose / Function	Potential Failure Mode (FM)	Potential Failure Effects	S E V	CURRENT PROCESS				Actions Recommended	Process Ov
					Potential Causes	O C	Current Controls	D E P N		
Raw Material	Supply compliant raw material to forming on-time	Counterfeit / wong material shipped to the compnay	Product Failure in use	10	Vendor unapproved	1	Raw materials purchased from Approved Suppliers from DFAR melt countries only.	1	10	
	Supply compliant raw material to forming on-time	Counterfeit / wong material shipped to the compnay	Product Failure in use	10	Vendor shipped wrong product	2	Alloy Verification performed on coils and bars	1	20	
	Supply compliant raw material to forming on-time	Counterfeit / wong material shipped to the compnay	Product Failure in use	10	Vendor shipped wrong product	1	Material Testing performed on all lots to assure function of product. (e.g. shear / tensile confirmation of metal response to heat treat)	1	10	
Manufacturing	Manufacture Product under the control of the QMS of the Company	Parts from Conterfeit manufacture enter value stream	Product Failure in use	10	Product purchased to fulfill demand	0	Cause is not practiced by BB/GS	1	0	
	Manufacture Product under the control of the QMS of the Company	Parts from Conterfeit manufacture enter value stream	Product Failure in use	11	Product purchased to fulfill demand	1	Parts are head marked with company marking.			
	Manufacture Product under the control of the QMS of the Company	Parts from Conterfeit manufacture enter value stream	Product Failure in use	10	Product purchased to fulfill demand	0	Inspection for company part marking	1	0	
		Non-compliant parts escape facility and sold	Product Failure in use	10	stolen product	1	Non-compliant product scrapped using certified destruction by scrap vendor.	1	10	
Assembly	N/A	N/A	N/A	N/A	N/A	N/A	BB/GS does not perform assemblies	0	0	

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