Process Control Document
Counterfeit Materials Avoidance

Process Information

Process Name	Counterfeit Materials Avoidance
Process Description	Controls to avoid introduction and use of counterfeit materials
Process Owner	Quality Manager
Department	Quality
Level Up	Quality Manual
Level Down	Training & Inspection Forms

Revision History

Revision	Date Effective	Operations Approval *(may be a non-operations department head)*	Changes Made
-	9-2-15	MAW	Introduction of document.
1	2-1-2017	MAW	Converted document into PCD document family and clarified process controls.
2	7-6-2023	Janice Eckhardt	Converted to updated template with overhaul of document to include the Counterfeit Material Avoidance Policy and update of the process.

Process Control Document Counterfeit Materials Avoidance

1. **Purpose - Counterfeit Material Avoidance Policy**
   1.1. This document outlines established process controls put in place to avoid introduction of counterfeit materials to the manufacturing process.
   1.2. **Counterfeit Material Avoidance Policy**. InterLnX, Inc. is committed to preventing the purchase, acceptance, and distribution of fraudulent parts. Materials and parts are purchased new from authorized suppliers, distributors, or original manufacturers and Certificates of Conformance are required to ensure product authenticity. InterLnX employees involved in the ordering, receiving, inspection, and production processes are trained in counterfeit material detection and avoidance and are responsible for identifying, isolating, and reporting any material or parts suspected of being a copy, imitation, or substitute for an original, authorized item.

2. **Definitions**

   ASL – Approved Supplier List.
   Authorized Distributor – A distributor with which the OEM or OCM has a contractual agreement to stock, repackage, sell, and distribute its product lines.
   Broker – A supplier which is not authorized or under the oversight of the part's OEM or OCM. These companies are also referred to as Independent Distributors, Non-Authorized Distributors, Non-Franchised Distributors, or Non-Authorized Suppliers.
   COTS - Commercial Off-The-Shelf
   Counterfeit Item – Any item that is a copy, imitation, or substitute for an original, authorized OEM or OCM item.
   FAR Council – Federal Acquisitions Regulatory Council
   GIDEP – Government – Industry Data Exchange Program
   IIP – Incoming Inspection Plan
   OEM – Original Equipment Manufacturer
   OCM – Original Component Manufacturer

3. **Responsibilities**
   3.1. All InterLnX Team members are responsible for identifying, isolating, and reporting any suspected counterfeit materials, parts, or equipment to a member of the management team.
   3.2. All employees involved in purchasing, receiving, inspecting, testing, packaging, or assembly are required to complete Counterfeit Materials Detection Training.
   3.3. The Purchasing Department is responsible for mitigating risk by ensuring materials are sourced from the InterLnX ASL of vetted and approved suppliers.
   3.4. The Quality and Warehouse Departments are responsible for ensuring the authenticity of all incoming materials, parts, and equipment.
   3.5. The Quality Manager is responsible for ensuring that any materials suspected as counterfeit are isolated and identified, and that all interested parties are notified and internal processes for nonconforming materials are followed.

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4. Process Control

4.1. Counterfeit Materials Detection Training is provided to all employees directly involved in purchasing, receiving, inspecting, or handling raw materials. Employees who assemble products, conduct final inspections, or package finished products are also required to complete this training within 30 days of hire date.

4.2. Supply Chain – InterLnX has a defined purchasing process to control risk of procuring and receiving counterfeit materials. See PCD_Purchasing.

4.2.1. All materials are purchased from vendors vetted and approved for the InterLnX ASL.

4.2.2. When required by an InterLnX customer, all materials shall be purchased directly from an OEM or from an authorized distributor.

4.3. Receiving – See PCD_Receiving.

4.3.1. The Warehouse Department receives purchased materials into EIQ and verifies that purchase order requirements have been met.

4.3.2. The Warehouse Department forwards identified purchases to the Quality Department for Receiving Inspection. This includes materials and equipment used directly in the assembly of customer products.

4.4. Inspection – See PCD_Receiving, PCD_Inspection, PCD_Nonconformance Control, WI_EIQ Receiving Inspection, COTS Checklist, and IIP sheets. Receiving inspection shall review packaging, the physical product, and associated documentation for signs of potential counterfeit material including:

4.4.1. Manufacturer logos or labels containing misspellings, smudged, or questionable appearance.

4.4.2. Obvious signs of poor, substandard, or out of control manufacturing processes such as varying component lead lengths, significant differences in identifying markings, ink smears, etc.

4.4.3. Characteristic measurement results indicating questionable differences from typical product received.

4.4.4. Other signs of variance from typical product received.

4.5. Disposition of suspected counterfeit materials and equipment.

4.5.1. Any InterLnX Team member who suspects parts or equipment of being counterfeit at any time shall immediately isolate the parts or equipment and notify a member of the management team.

4.5.2. The Quality Department shall quarantine all suspect parts and initiate an MRB process for material disposition.

4.5.3. When counterfeit material is discovered the Quality Department shall immediately notify affected customers with pertinent facts and provide OEM documentation to the customer that authenticates traceability of the affected parts to the applicable OEM.

4.5.4. When required, the Quality Department shall report counterfeit materials in accordance with FAR rules to the Government – Industry Data Exchange Program, GIDEP.

5. Forms and Records

5.1. COTS Checklist, *Located in Controlled Documents*

5.2. Incoming Inspection Plan, *Located in, EIQ, Document Control*

6. **Related Documents** available through the Controlled Documents Master List
   6.1. PCD_Purchasing
   6.2. PCD_Nonconformance Control
   6.3. PCD_Receiving
   6.4. PCD_Inspection
   6.5. WI_EIQ Receiving Inspection
   6.6. Counterfeit Materials Detection Training