



DEFENSE LOGISTICS AGENCY
LAND AND MARITIME
P.O. BOX 3990
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17 January 2018

MEMORANDUM FOR MILITARY/INDUSTRY DISTRIBUTION

SUBJECT: Engineering Practice Study to Standardize Retention Data Requirements
for Multiple Commodities.
Project Number 5961-2018-029

The initial draft for this subject document, dated 17 January 2018, is now available for viewing and downloading from the DLA Land and Maritime website:

<https://LandandMaritimeApps.dla.mil/Programs/MilSpec/DocSearch.aspx>

The study results will be used to help determine appropriate data retention requirements that are common across multiple related commodities.

Concurrence or comments are required at this Center within 45 days from the date of this letter. Late comments will be held for the next coordination of the document. Comments from Military departments must be identified as either "Essential" or "Suggested". Essential comments must be justified with supporting data. Military review activities should forward comments to their custodians of this office, as applicable, in sufficient time to allow for consolidating the department reply. Since Navy-EC is the custodian for this document, all Navy review activities should forward their comments directly to this Center.

The point of contact for this document is Mr. Jason Hochstetler, DLA Land and Maritime-VAC, Post Office Box 3990, Columbus, OH 43216-3990. Mr. Hochstetler can also be reached at 614-692-7106/850-7106, or by facsimile 614-692-6939/850-6939, or by e-mail to: Jason.Hochstetler@dlamail.mil.

/signed/
Thomas M. Hess
Chief
Active Devices Team



ENGINEERING PRACTICES STUDY

TITLE: SURVEY TO STANDARDIZE RETENTION DATA REQUIREMENTS FOR
MULTIPLE COMMODITIES.

17 January 2018

STUDY PROJECT (SEE ATTACHMENT 1)

PRELIMINARY

Study Conducted by DLA LAND AND MARITIME

Prepared by:

Jason Hochstetler

I. **OBJECTIVES:** DLA Land and Maritime-VAC is conducting a survey on the data retention requirements for general specifications, including MIL-PRF-19500 and other general specifications for related electronic devices. The purpose of this survey (in **Attachment 1**), is to obtain input from the manufacturers, military services, and user communities on the preferred length of time and type of records to maintain. The survey results will help determine the length of time and types of records that can be aligned across DLA general specifications.

II. **BACKGROUND:** The general specifications data retention requirements are not the same for all electronic commodities. One example of an inconvenience that this poses is that when evaluating devices on an electronic system the availability of data is different depending on the device type even though they are all on the same circuit board or system. The general specifications for electronic devices currently specify different data retention times, and types of data required, to be maintained. The general specifications either specify their own individual requirements or use the requirements from MIL-STD-790. An example of some of the general specification data requirements are listed below.

Current retention times:

MIL-PRF-38534: 3 years all Classes except Class K; Class K: 7 years

MIL-PRF-38535: 5 years (records pertaining to screening and quality conformance)

MIL-PRF-19500: 10 years

MIL-STD-790: 5.2.18.1 Records to be maintained. Records shall be legible and maintained which will adequately describe the processes, materials, inspections, and tests which affect the quality of the device for appropriate amounts of time such that quality concerns and customers are properly supported (e.g. conformance testing records). The records pertaining to production processes, incoming, and in-process inspections should be retained for a minimum of 3 years (7 years for space level) and those pertaining to performance verification retained for a minimum of 5 years (7 years for space level) after performance of the inspections. Records pertaining to alternate methods (with qualifying activity approval), conformance testing shall be retained for 5 years (7 years for space level) after the process or materials affected have been removed from the qualified flow.

Proposal. DLA Land and Maritime has received a proposal to align the data retention requirements in DLA general specifications for electronic devices. It includes retaining all design, manufacturing, testing, and quality records for each lot, for 15 years after delivery of the product.

Please review the complete list of record types proposed and survey questions in **Attachment 1**.

III. **RESULTS:** All comments on this study shall be submitted to jason.hochstetler@dla.mil. Resulting coordinated comments will be shared with the rest of the document standardization division to provide a basis for standardizing the data retention requirements of the related general performance specifications. Comments to this study shall be submitted to DLA Land and Maritime within 45 days from the date of this letter.

IV. **CONCLUSIONS:** The final comments on this study will be published in a final EP study report after all submitted comments have been resolved.

V. **RECOMMENDATIONS:** DLA Land and Maritime recommends that all military and industry representatives review the data retention survey and provide comments.

Attachment 1

Proposed requirement verbiage to be added to DLA Land and Maritime general specifications record retention section:

Record retention. The manufacturer of QML devices (all class levels) shall retain all design, manufacturing, testing and quality records for each lot for a period of 15 years after delivery of product. The records shall include as a minimum:

- a. Design
- b. Manufacturing
- c. Travelers
- d. Inspection
- e. Test results
- f. Screening results
- g. Qualification plans and results
- h. Quality conformance test results
- i. Rework
- j. Failure analysis and corrective actions
- k. TRB decisions
- l. Training
- m. Customer returns

The records shall be retained in the form in which they were originally defined but electronic media is preferred and a copy shall be provided to the qualifying and/or procuring activity as requested.

Survey Questions:

1. What is the standard amount of time manufacturers retain data for military products? For commercial products?
2. Is a proposed 15 year retention time acceptable?
3. What concerns do manufacturers have with retaining records electronically?
4. Can all lot data be retained, including travelers, incoming inspection, R&R, screening, QCI, etc. If the answer is no, what data can be retained?
5. What financial hardship, if any, would this endeavor impose?
6. For users of military devices, are there any additional types of data that you would like to see retained?