



SUSTAINMENT

## OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3500

### MEMORANDUM FOR PRODUCT QUALITY DEFICIENCY REPORT PROCESS REVIEW COMMITTEE

SUBJECT: Approved Defense Logistics Management Standards Change 1453, Update Product Quality Deficiency Reporting (PQDR) Process for Missing Bare Item Materiel Marking Discrepancies

The Defense Logistics Management Standards change, as outlined in the attachment, is approved for implementation.

Addressees may direct questions to Mark Rockwell e-mail: [DEDSO.PQDR@dla.mil](mailto:DEDSO.PQDR@dla.mil). Others must contact their designated Process Review Committee (PRC) representative available at <https://www.dla.mil/Defense-Data-Standards/Committees/Contacts/>.

Leigh E. Method, SES  
Deputy Assistant Secretary of Defense  
for Logistics

Attachment  
As stated

cc:  
OUSD(C)  
DLA J6DS

# Approved Defense Logistics Management Standards Change 1453 Update Product Quality Deficiency Reporting Process for Missing Bare Item Materiel Marking Discrepancies

## 1. ORIGINATING SERVICE/AGENCY AND POC INFORMATION:

### a. Technical POC:

(1) Headquarters, Naval Supply Systems Command, Todd Kepner, 717-605-6483, Todd.m.kepner.civ@us.navy.mil.

(2) Headquarters, Naval Supply Systems Command, Jared Trinkaus, 485-515-2504, jared.s.trinkaus.civ@us.navy.mil.

### b. Functional POC:

(1) Headquarters, Army Materiel Command, Marc Saperstein, 973-769-6410, marc.d.saperstein.civ@army.mil.

(2) Headquarters, United States Marine Corps, Chief Warrant Officer (CWO5) Jason Pierce, 571-256-7127, jason.m.pierce@usmc.mil.

(3) Defense Logistics Agency (DLA), Jamie Goodrick, 267-315-5426, Jamie.goodrick@dla.mil.

(4) Defense Contract Management Agency (DCMA), Christopher Ford, 804-609-4286, Christopher.e.ford12.civ@mail.mil.

(5) Headquarters, United States Air Force, John Wright, 703-697-5238, John.wright.45@us.af.mil.

## 2. REASON FOR CHANGE: Significant changes after staffing the proposed change are in green shade.

a. **Bottom Line Up-Front:** This change clarifies the proper reporting method as it relates to manufacturing deficiencies discovered on an item, and more specifically, illegible or missing bare item marking(s) required per the technical data package (TDP).

### b. Background:

(1) Bare item marking(s) are markings directly applied (or permanently affixed) to the surface of the item itself, not the packaging or the documentation, which are required by a technical data package, military specification, drawing, federal legal standard, or other technical document. If an item is described as "bare" and is missing markings, it suggests that it lacks any identifying or distinguishing marks or labels. This could make it difficult to determine its origin, manufacturer, specifications, or any other pertinent information typically conveyed through markings. Materiel missing bare item marking(s) will be considered deficient and reported

accordingly. When Department of Defense (DoD) end users receive materiel that is missing bare item marking(s), a technical evaluation is performed to determine if the materiel is acceptable in the application despite the missing bare item marking(s). This evaluation includes reviewing the materiel requirements, determining if the bare item marking(s) is essential to objective quality evidence, and performing an analysis to determine if installing the materiel without the required objective quality evidence could potentially cause harm in the intended application. If the engineering review determines the materiel will not meet the intended application based on concerns related to safety, traceability, or usability of the materiel, DoD end users have insisted the need to submit a Product Quality Deficiency Report (PQDR).

(2) When a technical evaluation determined the missing objective quality evidence renders the materiel unsatisfactory for the intended application, the PQDR process is the applicable reporting method. However, DLA activities often reject the PQDRs, noting policy requires a Supply Discrepancy Report (SDR).

(3) In June of 2022, a working group consisting of representatives from the Office of the Under Secretary of Defense (Acquisition & Sustainment), Navy, Defense Enterprise Data Standards Office, and DLA reviewed a document released by the Department of Energy (DoE) titled, “*Suspect/Counterfeit & Defective Fastener Inspection*,” (dated May 16, 2022). The report detailed the importance of clear headmarks (bare item marking(s)) to ensure conformance with consensus standards such as American Society for Testing and Materials (currently referred to as ASTM International), American Society of Mechanical Engineers (ASME), International Organization for Standardization (ISO), Society of Automotive Engineers (SAE), etc., and that missing markings could mean the item is defective, counterfeit, or fraudulent because it does not meet the consensus standard requirements. The research conducted by the DoE further supports the need for the DoD to adjust its logistics standards by requiring all bare item marking deficiencies by End Users be reported as PQDRs due to the high probability that a true quality defect could exist.

### 3. CHANGE IN DETAIL:

a. **Technical Details:** This change clarifies Defense Logistics Manual (DLM) 4000.25, Volume 2, Chapter 17 for Supply Discrepancy Reporting and Chapter 24 for Product Quality Deficiency Reporting as it relates to proper reporting of manufacturing deficiencies to the item itself, and more specifically, illegible or missing bare item marking(s) required per the technical drawing of the item. Proposed changes include the following:

(1) Introduces a new definition of what constitutes as a bare item marking in both Chapter 17 and Chapter 24.

(2) Revises Chapter 17 to clearly state that DoD storage activities, supply points, and warehouse activities at the wholesale or retail level will prepare a SDR for missing bare item marking(s) related discrepancies.

(3) Updates Appendix 7.28 by removing SDR Discrepancy Code T7 under the “Technical Markings” section and introduces a new SDR Discrepancy Code Q9 – “Missing required bare item marking(s)” under the “Quality - Related Receipts/Stock Screening (Storage

Activity Only)” section. This more clearly aligns the missing bare item marking(s) with the potential quality related issues that can occur when bare item marking(s) is missing or illegible.

(a) DAAS will reject any new 00 SDR submissions identifying discrepancy code T7.

(b) DAAS will allow existing SDRs identifying discrepancy code T7 to continue to process until the SDR is in a completed status.

(4) Revises Chapter 24 to clearly state that all end users (non-storage activities) will report bare item marking(s) related issues as PQDR only.

(5) Defines form, fit, and function as it relates to PQDRs. Additionally, the change directs Screening Points and Action Points to collectively determine if bare item marking(s) deficiencies that do not affect form, fit and function can be deemed an isolated incident or whether it requires a full technical evaluation to determine the recurrent root cause.

b. **Revised Transaction Flow:** No impact to current SDR or PQDR transaction flow.

4. **IMPLEMENTATION TARGET:** Upon approval.

5. **TECHNICAL IMPACT:**

a. **Additions or Changes to Data Elements:** None.

b. **Automated Information Systems (AIS):** At a minimum, the following SDR systems must make updates as outlined in this change: Product Deficiency Reporting and Evaluation Program (PDREP), General Service Administration Vision, DLA Distribution Standard System (DSS), DLA Enterprise Business System (EBS), and DLA Warehouse Management System (WMS), Army Logistics Modernization Program (LMP), Air Force Security Assistance and Cooperation SDR-A, Air Force Stock Control System (D035K), and Air Force Integrated Logistics System-Supply (ILSS).

c. **Defense Automatic Addressing System (DAAS):** DAAS will update WebSDR by adding the new SDR Discrepancy Code Q9 and removing SDR Discrepancy Code T7.

6. **PUBLICATION/POLICY IMPACT:**

a. **Defense Logistics Manual (DLM) 4000.25:**

(1) DLM Volume 2, Chapter 17, Supply Discrepancy Reporting

(2) DLM Volume 2, Chapter 24, Product Quality Deficiency Reporting

(3) DLM Volume 2, Appendix 7.28, Supply Discrepancy Report Relevant Data Elements.

b. **Non-DLM 4000.25 Publications:** Components to update internal guidance with these changes as needed.

(1) DCMA-MAN 2301-06, Discrepancy Processing

(2) Technical Order 00-35D-54, USAF Deficiency Reporting, Investigation, and Resolution (DRI&R)

**7. ASSUMPTIONS:** DoD IT systems will not be able to be immediately programmed to ensure proper processing of reports submitted in accordance with this change. Therefore, it will be imperative that DoD Components conduct proper messaging and or training with their personnel to ensure compliance.

**8. FINANCIAL IMPROVEMENT AND AUDIT REMEDIATION (FIAR), MATERIAL WEAKNESS, AND AUDIT-RELATED INFORMATION:**

- a. **Notices of Findings and Recommendations (NFR):** None identified.
- b. **Corrective Action Plan (CAP) References:** None identified.
- c. **Other FIAR, Material Weakness, & Audit-Related Information:** None identified.

**9. END-TO-END TESTING REQUIREMENTS:** Not applicable.

**10. REFERENCES:**

- a. DLM 4000.25, Volume 2, Chapter 17, Supply Discrepancy Reporting
- b. DLM 4000.25, Volume 2, Chapter 24, Product Quality Deficiency Reporting
- c. DLM Volume 2, Appendix 7.28, Supply Discrepancy Report Relevant Data Elements
- d. Suspect/Counterfeit & Defective Fastener Inspection, Department of Energy, May 16, 2022

**11. PROPOSED DLMS CHANGE (PDC) 1453 RESPONSE/COMMENT RESOLUTION:**

See Consolidated PDC 1453 Comment and Response matrix in Enclosure 1.

**12. PROPOSED FUNDING REQUIREMENTS:**

	Component	Response/Comment
1.	DLA	No Comment Provided.
2.	Army	No Comment Provided.
3.	Air Force (SDR)	No Comment Provided.
4.	Air Force (PQDR)	No Comment Provided.
5.	Navy	No Comment Provided.
6.	DCMA	Funding is not required for this change currently.
7.	USMC	No Comment Provided.

8.	USTRANSCOM	No Comment Provided.
9.	DAAS	No Comment Provided.

**13. IMPLEMENTATION TIMELINE AND ESTIMATED COMPLETION DATE:**

	Component	Response/Comment
1.	DLA	No Comment Provided.
2.	Army	No Comment Provided.
3.	Air Force (SDR)	No Comment Provided.
4.	Air Force (PQDR)	No Comment Provided.
5.	Navy	No Comment Provided.
6.	DCMA	The PDC imparts no changes that require an implementation timeline.
7.	USMC	No Comment Provided.
8.	USTRANSCOM	No Comment Provided.
9.	DAAS	No Comment Provided.

## Enclosure 1

### PDC 1453 Comment Matrix (Enclosure 1)

Component Input			Action Officer Response		
ORG	COMMENT	RECOMMENDED CHANGE	COMMENTOR	Accept or Reject	DEDSO Notes
DLA	1. Page 2 Para C24.8 Substantive:  Audit Impact: Last sentence excludes Material from C&T or other Material or items that are not "installed."	In the last sentence, recommend changing "installing activity" to "using activity"	DLA	Accepted	Acknowledged: (PQDR)-recommendation applied.
	2. Page 2 Para 3.a.(3) Substantive: The paragraph explains the removal of the T7 code, but does not mention how open/existing SDRs with a discrepancy code of T7 will be handled. Add a new paragraph under (3) that explains how open SDRs with a T7 discrepancy will be	Add a new paragraph under (3) that explains how open SDRs with a T7 discrepancy will be handled and that WebSDR will reject newly created SDRs listing T7 as one of the identified discrepancies. Change the number of the current paragraphs (4) and (5) to (5) and (6).	DLA	Accepted	Concur. Updated ADC to reflect DAAS will reject any new 00 submissions identifying discrepancy code T7. DAAS will allow existing SDRs identifying discrepancy code T7 to continue to process until the SDR is in a completed status.
	3. Page 6 Para C17.3.2.10 Substantive:  Please clarify what 'manufactured material markings physically applied to material' means. This phrase is found throughout the PDC. Does this apply to labels, stickers, bags, certs, etc.? Or is it talking about being permanently and legibly applied to the material and withstand cleaning and environmental factors?	Reword (throughout document): From: 'manufactured material markings physically applied to material'.  To: permanent and legible markings during the manufacturing process applied to material and able to withstand cleaning and environmental factors giving it the same expected life as the product itself.	DLA	Accepted	Concur: The definition of bare item markings has been clarified to clearly state them being directly applied (or permanently affixed) to the surface of the item itself.

ARMY	1. Page 2 Line 7 Para 2 Substantive:  There is an extra "L" in the word material. Remove the extra "L" in the word material - "quality evidence renders the material unsatisfactory..."		ARMY	Accepted	Acknowledged recommendation applied.
AIR FORCE (SDR)	1. Page 3 Line 2.b.(3) Substantive:  Change "American Society for Testing Materials (ASTM) to "ASTM International" To be considered an international standardization body they changed their name to ASTM International.		B. Curtis, AFPET/PTP	Accepted	Acknowledged by PQDR/SDR and updated.
	2. Page 3 N/A Para 6 b. Substantive:  Update 00-35D-54 Provide guidance for bare item markings IAW PDC 1453.		Jason McKaughan, 748 SCMG	Accepted	Acknowledged and updated.
	3. General Substantive: What is the definition of a "bare item"	Add a definition of a "bare item". One of our engineers scanned the DLA website and policy documents and found no Definition of a "Bare Item."	"Dave Neumeier, Ctr support A4/10-EN david.neumier.ctr@us.af.mil"	Accepted	Acknowledged and updated.
	4. General Substantive: Title and other locations refer to "Bare Item Material Marking". Other locations refer to "bare item markings."	Select one term/type and standardize the document	Mr. Keving Kaysing, NH-04, AFTC/DS	Rejected	Two different meanings are intended.
	5. Page 1 Para C17.3.2.10.1. & C24.8 A:	Update to align wording.	Mr. Keving Kaysing, NH-04, AFTC/DS	Accepted	Acknowledged and updated.



	C17.3.2.10.1 and C24.8 both address what bare item markings are, but the wording is different (C24.8 is more detailed).				
Air Force (SDR)	Page 1, 2 Para C17.3.2.10.1. & C24.8 A:  C17.3.2.10.1 uses “Bare item marking(s) is” and C24.8 uses “Bare item marking(s) are.”	Update to align wording	AIR FORCE (SDR)	Accepted	Acknowledged by PQDR and grammar updated.
AIR FORCE (PQDR)	Concur w/o comment				
NAVY	Concur w/o comment				
DCMA	Concur w/o comment				
USMC	Concur w/o comment				
TRANSCOM	Concur w/o comment				
DAAS	Concur w/o comment				

## Enclosure 2

### Revised Defense Logistics Manual (DLM) 4000.25, Volume 2, Supply Standards and Procedures

Make the following changes to Volume 2. Additions are shown in **red bold italics**. Deletions are shown by double strikethrough text.

#### Volume 2, Chapter 17 Supply Discrepancy Reporting

*(Preceding text not shown)*

##### A.

##### C17.1.8. Types of Discrepancies

C17.1.8.3. Product Quality Deficiency. **Refer to Chapter 24 of DLM 4000.25, Volume 2, for complete PQDR guidance.** A product quality deficiency is a defective or non-conforming condition that limits or prohibits the item from fulfilling its intended purpose. These include deficiencies in design, specification, materiel, manufacturing, and workmanship. These are reportable on an SDR only by a Security Assistance customer. All others follow PQDR policy found in DLAR 4155.24/AR 702-7/SECNAVINST 4855.5B, AFR 74-6 Product Quality Deficiency Report Program. Quality deficiencies reported via SDR will be investigated within the ICP/IMM under procedures associated with Product Quality Deficiency Reports. PQDR resolution provided via SDR reply to the submitting ILCO will identify the associated PQDR record control number (RCN) as a cross-reference to the PQDR identification used by the ICP/IMM.

##### C17.3. PROCEDURES

C17.3.2.10. Technical Data. Report item technical information, (e.g., name plate, operating handbook, logbook, precautionary markings, warranty data, engineering drawings and associated lists, specifications, standards process sheets, manuals, technical reports, catalog item identifications, and related information) that are missing, illegible, incomplete and/or incorrect regardless of dollar value. When reparable are returned and the appropriate historical information/documentation, operator/maintenance logbooks, engine oil analysis, etc., as required by Government regulations, and/or technical manuals are not included, the receiving activity will submit an SDR regardless of dollar value. Any additional costs incurred by the repairing depot/arsenal because of the missing data will be charged to the originating activity. The submitter will ensure that the specific description of what documentation is missing is included in the remarks section.

**C17.3.2.10.1. Bare item marking(s) are markings directly applied (or permanently affixed) to the surface of the item itself, not the packaging or the**

documentation, which are required by a technical data package, military specification, drawing, federal legal standard, or other technical document. Materiel missing bare item marking(s) will be considered deficient and reported as follows:

C17.3.2.10.1.1 DoD storage activities, supply points and warehouse activities at the wholesale or retail level will submit a SDR (actionable in SCC "L") for missing bare item marking(s) only for new procurement receipts (SDR Document Type Code 9/P) when contract requirements call for bare item marking(s) or MIL-STD-130 requirements.

C17.3.2.10.1.1.1 SDR discrepancy code Q9 will be used to specify the discrepancy is related to bare item marking(s).

B.

## Volume 2, Chapter 24, Product Quality Deficiency Reporting

*(Preceding text not shown)*

**C24.8.** Bare item marking(s) are markings directly applied (or permanently affixed) to the surface of the item itself, not the packaging or the documentation, which are required by a technical data package, military specification, drawing, federal legal standard, or other technical document. Materiel missing bare item markings will be considered deficient and reported as PQDRs by all end users at the installing or using activity.

C24.8.1 When materiel is reported as a PQDR due to issues related to bare item marking(s), and the missing marking does not change the form, fit or function of the item, Screening Points and Action Points will collectively decide whether the initial deficiency being reported under the same NIIN, CAGE, contract number, and deficiency description, requires a full investigation to determine root cause, or if it is acceptable to close it as an isolated incident pending subsequent reporting. Any subsequent reporting will automatically require a full technical evaluation to determine the recurrent root cause.

C24.8.2. Form, Fit, and Function is technical data pertaining to items, components, or processes for the purpose of identifying source, size, configuration, mating and attachment characteristics, functional characteristics, and performance requirements. CFR 22 CFR § 120.42 defines Form, Fit, Function as follows:

C24.8.2.1. Form. The form of a commodity is defined by its configuration (including the geometrically measured configuration), materiel, and materiel properties that uniquely characterize it. For software, the form means the design, logic flow, and algorithms.

**C24.8.2.2. Fit. The fit of a commodity is defined by its ability to physically interface or connect with or become an integral part of another commodity. For software, the fit is defined by its ability to interface or connect with a defense article.**

**C24.8.2.3. Function. The function of a commodity is the action or actions it is designed to perform. For software, the function means the action or actions the software performs directly related to a defense article or as a standalone application.**

**C.**

## **DLM 4000.25, Volume 2, Appendix 7: Data Elements and Codes**

*(Preceding text not shown)*

### **AP7.28.2. SHIPPING AND PACKAGING DISCREPANCY CODES**

AP7.28.2.1. The following codes are used to provide a description of the discrepant condition. Multiple codes may be used on a single report. Customer-prepared SDRs may use up to three discrepancy codes per SDR. SDRs associated with Distribution Center receipts may identify up to three discrepancy codes per SDR. Preprinted codes on the face of the SF 364 may be supplemented from this list of codes. Use of the expanded list of codes is encouraged to clearly identify the discrepant situation, reduce the reliance on narrative descriptions, and facilitate capture of SDR metrics.

*(Preceding text not shown)*

### **DISCREPANCY CODES**

#### **Quality - Related Receipts/Stock Screening (Storage Activity Only)**

*(Preceding text not shown)*

**Q9      Missing required bare item marking(s)**

*(Preceding text not shown)*

#### **Technical Markings (Name Plates, Log Books, Operating Handbooks, Special Instructions)**

T1    Technical data markings missing

T2    Technical data markings illegible or mutilated

- T3 Precautionary operational markings missing
- T4 Inspection data missing or incomplete
- T5 Serviceability operating data missing or incomplete
- T6 Warranty data missing
- ~~T7 Missing part number on bare item~~
- T9 Operating handbooks, logbooks, and/or special instructions missing