

TRAINING AID

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DESIGN ACTIVITY TRANSFERS AND ITEM IDENTIFICATION

1. **BACKGROUND:** One of the most overlooked drawing requirements of MIL-STD-100G is for design activity transfers. Failure to follow the strict rules for design activity transfers causes severe problems with the identification of drawings and items. These problems include the tracking, storing, and retrieving of engineering data and of item identification. Now that we are in a digital era, failure to abide by the rules of MIL-STD-100G invites a national crisis in DoD information system management and interface.

2. **WHAT IS A "DESIGN ACTIVITY TRANSFER"?** This is the transfer of the master, original drawing or drawings, together with any items they configure, from one design activity to another. All engineering responsibility, ownership, and liability transfers absolutely from the loser to the gainer.

3. **WHAT IS A "DESIGN ACTIVITY"?** A "design activity" is an activity that has, or had, responsibility for the design of an item, or is the activity that has been designated to be entered into the title block of a drawing. The term is thus debatable and inconclusive, and it's meaning varies by contextual usage. When using the term in context with identifying a drawing or part number, the number is always the original design activity as shown in the title block of a drawing; however, for ownership purposes, the design activity is who has custody and ownership of the original drawing. Although ambiguous, the term "design activity" replaced the even more ambiguous "MANUFACTURER" term used prior to the 1960s. Two new terms were established created in 1991 to replace "design activity" for unequivocal usage. Related terms and rules were established or refined. These are found in MIL-STD-100G, as follows:

- a. Paragraph 3.49: "**Original design activity (ODA).** An activity (Government or contractor) having had responsibility for the design of an item and whose drawing number *and CAGE Code is shown in the title block* of drawings and associated documents."
- b. Paragraph 3.19: "**Current Design Activity (CDA).** An activity (Government or contractor) currently having responsibility for the design of an item, and the preparation and maintenance of drawings and associated documents. Current design activity could be the original activity or new activity when that responsibility is transferred from another Government or contractor design activity."
- c. Paragraph 3.35: "**Item identification.** The *combination* of the part or identifying number *and the original design activity CAGE Code*. (NOTE: Not applicable to vendor item drawings)."
- d. Paragraph 403: "**Drawing identification.** The drawing number and original design activity CAGE Code establish a drawing identification that shall be unique to that drawing. The relationship of drawing number and *original* design activity CAGE Code is *inviolable*, providing for drawing identification regardless of drawing ownership, design responsibility, adding of sheets, or current design activity. See. 6.4."

- e. In paragraph 406, "**Identification requirements**. All drawings, associated lists *and items* shall be assigned identification as follows:"

"**406.4 CAGE Code**. The CAGE Code shall be the CAGE Code of the design activity whose drawing number is *assigned* to the drawing and shall be entered on the drawing in the appropriate block, as shown in Figure 400-1. CAGE Code *assignment* shall establish a relationship between the *assigned Code* and the design activity name and address (appearing on the drawing), *at the time of assignment.*"

"**406.9 Transferring design responsibility to another activity**. When the design responsibility for engineering drawings is transferred from one design activity to another, the drawing number(s) and PIN(s) shall be transferred to the new design activity for administration. The new assignee shall add his CAGE Code, name, and address on the drawing by revision action to identify change in design responsibility. *In no case will the original drawing identity be changed or relocated to indicate a new CAGE Code.* Figure 400-2 illustrates an example of drawing notations indicating a transfer of design responsibility.

NOTE: *In addition, the CAGE Code of the original design activity specified in the item identification marking requirement shall not be changed."*

I.E., THE CAGE CODE IN THE TITLE BLOCK SHALL NEVER CHANGE!

Analyzing the above, we see that as long as there is no drawing transfer, the original and current design activities for a given master original drawing are one and the same, and the old term "design activity" can be used without confusion. However, we also see that when a transfer occurs, there are two classes of design activity: **current** and **original**. The **CURRENT DESIGN ACTIVITY** has current ownership and possession of the master, original drawing. He has sole authority for entering changes and advancing the drawing's revision letter. The **ORIGINAL DESIGN ACTIVITY** originally issued the drawing, and his name and CAGE Code stays in the title block "forever", no matter how many times the drawing changes hands. The critical point here is that it is the design activity in the title block, which is **always** the **original design activity**, which is used in combination with a PIN to establish an "**item identification**".

5. **RATIONALE**: The reason that, in all actions, items are identified to their original CAGE Code, rather than current, are as follows:

a. There are many millions more part numbers and drawings in our military logistics systems than there are stock numbers. The stock number system barely scratches the surface of the universe of part numbers and drawings "out there". In private industry, there are many more millions of drawings and parts than we have in our total logistics systems. Yet within our stocklist system, for example, we have 87 different part numbers "123" alone. There are 347 part numbers "1". The Air Force, Army, major military contractors, and others issue the exact same drawing numbers. Companies are selling product lines, consolidating lines, changing names, reorganizing, and FINDING THAT THEY **HAVE JUST ACQUIRED PART NUMBERS AND DRAWING NUMBERS THEY ALREADY HAVE -- BUT THEY'RE NOT THE SAME DRAWING OR ITEM!** ONLY THE NUMBERS HAPPEN TO COINCIDE! One engineer from a major aircraft corporation several years ago was heard complaining that they had just acquired a company whose drawing numbers and part numbers all duplicated numbers that his company had already assigned to other drawings and parts. This is the reason that MIL-STD-100 revisions A through G have the requirement to never change the CAGE Code. It is a matter of survival of private industry and government. The digital era of military logistics depends on it.

b. Next, no drawing or part can be used unless a higher level drawing calls for its use by CAGE Code and part number. Therefore, if a drawing's CAGE Code were to be changed, the next higher assembly drawing would not accept it. It would be the wrong drawing, because the CAGE Code is wrong in the mandatory combination of CAGE Code and drawing number.

c. Then, if the CAGE Code were changed, the "old" drawing would not "go away". It still exists because it has been formally released, issued and distributed. The CAGE Code change merely created a NEW DRAWING, and destroyed the master original of the previous drawing.

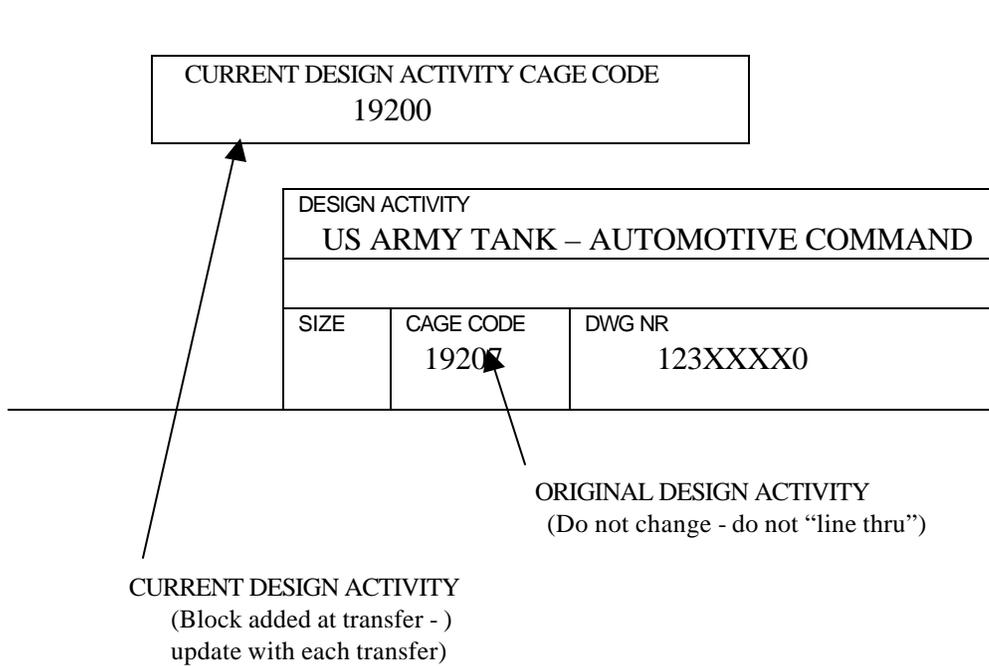
d. There have been occasional suggestions from cataloging personnel that our repositories should change the CAGE Code on all of our drawings to reflect the current CAGE Code each time there is a design activity transfer. This is utterly impossible. Our repositories report that there are thousands of duplicated document numbers, and any change would cause two different, unrelated documents having the same document number to have the same CAGE Code. For example, one company may own two, three, or more unrelated documents with the same document number, but each has a different CAGE Code. There is no way our repository can store and retrieve unrelated, different documents with the same document number under one CAGE Code.

e. In data repositories, if the CAGE Code is changed and new "revisions" are delivered, DOD systems do not "bump out" those older revisions of a different CAGE Code. Changing the CAGE Code causes DOD repositories to be "sprinkled" with the same drawing under different CAGE Codes. The system retains or "bumps out" revisions of documents by using a fixed combination of document number and CAGE Code. "Old" assembly drawings will call for the use of supporting detail drawings whose CAGE Code matches the "old" drawing, and the "latest" revisions will not be used if their CAGE Code differs from the old CAGE Code. It is thus critical to DOD drawing and logistics systems that the ODA CAGE CODE ALWAYS BE USED FOR IDENTIFICATION AND BE RETAINED ON TRANSFERRED DRAWINGS.

6. SUMMARY FOR DRAWING TRANSFERS:

a. TRANSFERRED DRAWINGS:

- (1). **Title block:** Do not change the CAGE Code, drawing number, or part number.
- (2). **Identification of current design activity:** Near the title block, add "CURRENT DESIGN ACTIVITY CAGE CODE" in accordance with MIL-STD-100G, paragraph 406.9 and figure 400-2, as follows:



- (3). **Revision:** Advance the revision letter and state "TO TRANSFER DESIGN RESPONSIBILITY TO CURRENT DESIGN ACTIVITY, CAGE CODE" or equivalent.

b. CALLING OUT OF TRANSFERRED DRAWINGS AND PART NUMBERS:

- (1). **Parts lists:** Enter the original CAGE Code with the part number if different from the CAGE Code of the parts list or drawing which cites it.
EXAMPLE: BULLMOOSE CORP has two divisions, Bullmoose East and Bullmoose West, each with their own CAGE Codes. Bullmoose East drawings must ALWAYS call out Bullmoose West part numbers WITH the Bullmoose West CAGE Codes in their part lists and notes, EVEN AFTER TRANSFER.
- (2). **Other associated lists:** Same principle as above for parts lists.
- (3). **Notes:** Any drawing reference to a drawing or part number must cite the ORIGINAL CAGE Code with the cited drawing or part number, unless the exception for citing CAGE Codes per MIL-STD-100G chapter 400 are met.

c. **ADDING NEW SHEETS, PINS, AND ASSOCIATED LISTS TO TRANSFERRED DRAWINGS :**

- (1). **Adding sheets:** The new sheet must always use the same CAGE Code as the ODA CAGE Code on the first sheet's title block.
- (2). **Adding parts:** The new part added to a transferred drawing must always use the ODA CAGE Code for item identification.
- (3). **Adding associated lists:** The new associated list (PL, DL, and IL) must be identified with the same CAGE Code as the "parent" or "basic" drawing with which it is associated.

7. **REFERENCES:**

DOD-STD-100C, paras 401.2, 402.3, 402.4, 402.9, 402.10, 402.12, 602.4, 603.2.13, 604.3.10, and 605.3.10.

MIL-STD-100G, paras 3.11, 3.21, 3.32, 3.35, 3.36, 3.49, 3.51, 6.4, 401, 402, 403, 404, 405, 406.1, 406.2, 406.3, 406.4, 406.6, 406.10, 406.11.2, and 406.13.

8. **SUMMARY CONCEPT:** Drawings and parts are assigned TWO permanent numbers (ODA CAGE Code and drawing number, or ODA CAGE Code and part number, respectively) at their origin for identification, and neither changes from cradle to grave. Any drawing or part is permanently and uniquely identified "forever" by that combination of numbers for an item or drawing identification. That permanently assigned CAGE Code is for identification only, and is absolutely unrelated to who may be the current design activity for that item.

This concept is critical in today's digital and database environment.

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HISTORICAL SAMPLE CAGE CODE PROBLEMS WITH XXX COMPANY DRAWINGS

PROBLEM BACKGROUND: Some XXX company drawings for equipment had CAGE Code 26839 in the title block, while others had U1605. This is because government cataloging assigned, at different times, two different CAGE Codes to the same identical company, and therefore the XXX company has CAGE Code 26839 on some drawings and CAGE Code U1605 on others for drawing preparation and release. The fact that a company can have two different CAGE Codes, and still have the same name and address, is not a problem, but how it is shown on drawings is critical.

DESCRIPTION OF PROBLEMS:

1. Some CAGE Code 26839 drawings and associated lists called out drawings and parts issued as CAGE Code U1605 drawings and parts, but failed to include CAGE Code U1605 as part of the required item and drawing identification. The drawings' users were subsequently misled into looking for CAGE Code 26839 parts and drawings, which did not exist, but existed instead as CAGE Code U1605 parts and drawings. Corrections required for engineering data was extensive. Errors entered in the government cataloging system are still not corrected. The following illustrates incorrect and correct methods of citing CAGE Codes that are not the same as the containing drawing, and both drawings are owned by the same company.

<p>1. INSTALL * P/N 12345-1 WITH MIL-A-XXXX ADHESIVE.</p>	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr> <td style="padding: 2px 5px;">1</td> <td style="padding: 2px 5px;">12345-1</td> <td style="padding: 2px 5px;">*</td> <td style="padding: 2px 5px;">WIDGET</td> </tr> <tr> <td style="padding: 2px 5px;">QTY</td> <td style="padding: 2px 5px;">PART NO</td> <td style="padding: 2px 5px;">CAGE</td> <td style="padding: 2px 5px;">NOUN</td> </tr> <tr> <td colspan="4" style="padding: 2px 5px; text-align: center;">PARTS LIST</td> </tr> <tr> <td colspan="4" style="padding: 2px 5px; text-align: center;">XXX COMPANY</td> </tr> <tr> <td colspan="2" style="padding: 2px 5px;">26839</td> <td colspan="2" style="padding: 2px 5px;">2769W6377</td> </tr> </table>	1	12345-1	*	WIDGET	QTY	PART NO	CAGE	NOUN	PARTS LIST				XXX COMPANY				26839		2769W6377	
1	12345-1	*	WIDGET																		
QTY	PART NO	CAGE	NOUN																		
PARTS LIST																					
XXX COMPANY																					
26839		2769W6377																			

INCORRECT

* THE XXX COMPANY DRAWING FAILED TO SHOW THAT THE PARTS IN THE PL AND NOTES, ALSO OWNED BY XXX COMPANY, HAVE A DIFFERENT CAGE CODE

1. INSTALL U1605 P/N 12345-1 WITH MIL-A-XXXX ADHESIVE.	1	12345-1	U1605	WIDGET
	QTY	PART NO	CAGE	NOUN
	PARTS LIST			
	XXX COMPANY			
	26839	2769W6377		

CORRECTED DRAWING

THE XXX COMPANY DRAWING NOW SHOWS THAT THE CITED PART(S) IN PL AND NOTES, ALSO OWNED BY SAME XXX COMPANY, HAVE A DIFFERENT CAGE CODE

IMPACT OF ERROR IN ABOVE HISTORICAL EXAMPLE

Manual and automated systems use BOTH the permanently assigned ODA CAGE Code and drawing number, or ODA CAGE Code and part number, for identification. Unless the proper original design activity CAGE Code is shown or understood, a search for a wrong part or drawing will get a "not here" response, or the wrong drawing or part, especially in DoD repositories where millions of drawings are stored under thousands of CAGE Codes.

OPTIONAL CONSIDERATION

USE OF FLAG NOTE TO ADD TRANSFER INFORMATION: What follows is not a requirement, but is a drafting practice used by one major aircraft manufacture, and may be considered for use by other contractors. A contractor who is CDA for a drawing whose ODA CAGE Code is different due to a transfer may wish to add a flag note next to the CAGE Code in the PL, and the flagged note may read similar to "THE DRAWING FOR THIS PART HAS BEEN TRANSFERRED FROM CAGE CODE XXXXX TO CAGE CODE XXXXX".

COMMONLY ASKED QUESTIONS:

The following are actual, frequent questions from both contractor and government personnel.

Q1. DESIGN ACTIVITY: At what point in drawing development am I "locked in" to using the CAGE Code I initially placed in the title block.

ANSWER: You're "locked in" when:

- a. The drawing has been released and distributed, normally, but some variation may be possible. See b through e below.
- b. The point in development is reached where damage or confusion would occur if the CAGE Code were to be changed.
- c. The technical manuals that identify the CAGE Codes have been released and issued.
- d. The callouts on released drawings reference the unreleased drawing or a part number thereon, and thus establish its CAGE Code and part number, unless correctable and corrected GLOBALLY.
- e. Parts have been manufactured to the drawings and are used, and they won't be re-identified to the new item identification.
- f. The drawings, or drawing copies, have been sent to the government.

Q2. DESIGN ACTIVITY: I have a master original drawing I acquired from another design activity. I now have to create a new dash number, and depict it on that drawing. Do I use my CAGE Code for its identification, or the original CAGE Code from the drawing's title block?.

ANSWER: The original CAGE Code in the title block of the drawing must be used for any existing or newly established part number shown on that transferred drawing. Using a different CAGE Code from that in establishing drawing's title block for a newly established PIN indicates that the new part number is established by a different drawing of the same number but different CAGE Code.

Q3. DESIGN ACTIVITY: Provisioning and cataloging type personnel tell me the CAGE Code on the drawing is obsolete, and it must be changed. Also, they won't let me use it in any provisioning information.

ANSWER: In NO case shall the original CAGE Code on the drawing be changed. In no case shall a line be drawn through the CAGE Code. The rules of drawing preparation, drawing numbering, part numbering, and item identification are established SOLELY by engineering data and configuration management rules of DOD-D-1000, MIL-T-31000, and MIL-STD-100, and shall always prevail in any conflict. Cataloging and provisioning personnel have no alternative than to accept and use ONLY those identities established under the engineering data and configuration management discipline. In addition, contrary to any other claim, cataloging and provisioning have no documented policy on the use of CAGE Codes with drawings and parts. Successful attempts by cataloging and provisioning to influence practices contrary to MIL-STD-100 will cause disapproval of a contractor's drawings and configuration management practices.

Q4. DESIGN ACTIVITY: A multi-sheet drawing was transferred to our facility from one of our other plants. The other facility has a different CAGE Code than ours, and their CAGE Code is on the drawing. Now our facility has to add another sheet. Do we place our CAGE Code on the new sheet or the CAGE Code used on the existing sheets?

ANSWER: The only possible CAGE Code that can be placed on the new, added sheet is the one existing on the present sheet 1, which shall always be the original design activity CAGE Code. The ODA CAGE Code shall always be used for the addition of new sheets, regardless of its creation and addition by a different current design activity through a design activity transfer. All sheets MUST have the same CAGE Code, in the same manner that all sheets must have the same drawing number. If you were to show your

different CAGE Code on your new sheet, you would have a wholly new, independent document which only coincidentally has the same document number. The new document would have missing leading sheets, and the old document would be missing the intended new sheet. In our digital data storage systems, a sheet with a different CAGE Code from other sheets is stored and retrieved separately from the remainder of the drawing sheets.

Q5. DESIGN ACTIVITY: A drawing was transferred to me from another design activity. It had an integral parts list. I don't work that way. I work with separate parts lists, so I am revising it to remove the integral parts list and am creating a separate parts list. I'm retaining the old CAGE Code in the title block of the drawing as required. When I create the separate parts list, it is a new document. Do I put my CAGE Code in the CAGE Code block of the new separate parts list I created?

ANSWER: Use the original CAGE Code of the associated drawing for the CAGE Code of the new separate parts list. The rules of ASME Y14.34 apply for identification of associated lists. The identification of a parts list and other associated lists is based on the identification of the parent drawing. The CAGE Code of the PL must be the same CAGE Code as its associated drawing. In digital storage systems, a PL for an associated drawing must have the same CAGE Code as the parent drawing or both will have their associated document "missing".

Q6. DESIGN ACTIVITY: I'm an Air Force design activity drafting office at an Air Logistics Center. When we have a design activity transfer of a contractor drawing or an Air Force drawing from some other facility, we've been lining through the CAGE Code and placing our CAGE Code right above it. Does this mean we have to stop?

ANSWER: Absolutely. You must stop at once. In addition to direction in MIL-STD-100, a 1991 letter from Wright Patterson AFB to the Air Logistics Centers directed cessation of original design activity CAGE Code change in any form. The "line through" is a revision change practice for showing a deletion, and the original design activity of a drawing can never be changed. Air Force activities are subject to the same DOD rules as anyone else. We have already experienced the catastrophic results of this seemingly innocent "line-through" practice. We have the same drawings under different CAGE Codes. We have different drawings now in our system that have the same drawing number and same CAGE Code, but the drawings are unrelated. In addition, users can't find the drawing they are looking for because they are seeking one of the original identification. The resulting chaos is a direct result of the pre-1960s practice of showing a CAGE Code different from the original CAGE Code. The DOD-STD-100C/MIL-STD-100G practice is there from "lessons learned". As stated earlier, industry and DOD logistics survival in a digital environment depends on the DOD-STD-100 identification practice for transfers.

Any change of the CAGE Code has significant adverse repercussions. First, the "change" does NOT change the CAGE Code. The "line through" and addition of a CAGE Code above it creates a wholly new and different drawing, having its own unique and wholly different drawing identification. The original drawing and all copies thereof remains in full release, but the original drawing is essentially destroyed, as it has been "misappropriated" to become the new original for a newly established drawing. The original for the "old" but still existing drawing has been destroyed. The CAGE Code alleged "change" does not change the status of the originally released drawing in any form, and any changes intended for its inclusion are not added to the original drawing. The drawing with the original CAGE Code remains fully active and is still used. Unless changed, Illustrated Parts Breakdown technical orders continue to show the original ODA CAGE Code as required for item identification of items, and new items with the new CAGE Code are not authorized for use. Cataloging will still show the old CAGE Code for parts. DFARS App E screeners will continue to use the items which have the original CAGE Code. JEDMICS and other holders of drawings will continue to store and distribute the drawing that has the original CAGE Code. Other drawings citing use of the drawing with the original CAGE Code do not authorize use of the new drawing with the "new" CAGE Code unless revised. If the new drawing with a changed CAGE Code assignment is intended for use by a drafting office, it is in violation of MIL-STD-100 mandates and that drafting office could be subject to pay all

customer's change expenses. The expense of the extensive changes to customer documentation and inventory would be considerable and unnecessary. Additionally, there are potential legal implications involved should incorrect documentation or items be used and, since we are involved with flight systems, safety of flight issues may also arise.

Q7. DESIGN ACTIVITY: I thought whenever I used the term "CAGE Code", it meant "manufacturer". Other times it seems to mean ODA, and sometimes it means CDA. What does "CAGE" and "CAGE Code" mean?

ANSWER: "CAGE" and "CAGE Code" does NOT mean "MANUFACTURER". The CAGE Code itself is only a number assigned to an entity without regard to that entity's function. Assignment of a code to an "entity" provides for convenience in digital information systems. CAGE does **NOT** mean contractor, ODA, CDA, vendor, or any other FUNCTIONAL relationship of that entity (agency, facility, vendor, or contractor) to which the CAGE Code number is assigned. For it to have a functional meaning, one must always prefix the term "CAGE" with a FUNCTIONAL MODIFIER, such as "ODA CAGE", "contractor CAGE", "CDA CAGE", etc., to convey a functional relationship of that CAGE to a specifically cited contract, process, vendor, drawing, packager, servicer, or part. Summarizing, use of the term "CAGE" alone is meaningless with respect to function, except when used in context with drawings and part numbers, in which case "ODA" CAGE is understood by MIL-STD-100G definition.

Q8. DESIGN ACTIVITY: I bought this other company, and I now have that company's drawings. Of course, they have a different CAGE Code. I've gone by the book on transfers: I properly did NOT change the CAGE Code in the title block of their drawings, and I ADDED my CAGE Code per MIL-STD-100G above the title block to show that I am the current design activity. Now, on my newly created assembly drawings and parts lists, when I call out for the parts of the company I took over, do I have to show the CAGE Code of the old company's parts? I shouldn't have to, because I own them now. If I enter the old company's CAGE Code by the old parts called out in my new PLs, it seems like that would throw the users off and make it seem like I don't own those parts.

ANSWER: On your new drawings and associated lists, you MUST call out both the part number AND THE DIFFERENT CAGE CODE of the called out part. The same applies to drawing callouts. Failure to cite the assigned ODA CAGE Code throws off users from looking for the right drawings and parts.

DISCUSSION: MIL-STD-100G chapter 400 item identification requires CAGE Code entries everywhere in PLs, and then allows the EXCEPTION that IF the CAGE Code of the cited part is the same as that of the containing drawing, the CAGE Code MAY be omitted. In the example cited, the CAGE Codes are different, and thus must be entered. *Item identification is totally unrelated to "ownership" or current design activity. Item identification is "eternally" assigned by part number and ODA CAGE Code only. This principle is based on survival in a universal digital world, which requires a "cradle to grave" system of identification to seamlessly bridge across all information systems of DoD and industry. Use of the ODA CAGE Code and part number for parts, and ODA CAGE Code and drawing number for drawings, are the only non-variables that permit interfaceable DoD and industry digital information systems.*

Q9. DESIGN ACTIVITY: My company has been assigned a new CAGE Code by Battle Creek, but we didn't go anywhere. We're still in the same building. The drawings even stayed in the same room. The new CAGE Code is just an administrative change to keep our mail from going to our other division up north. Surely that means there has been no "design activity transfer", and we can change the CAGE Codes on the drawings to the newly assigned CAGE Code, or line through the old CAGE Code and put our new CAGE Code there. But obviously, there can't be a design activity transfer because we didn't go anywhere, and neither did our drawings, so the rules cannot apply to us. Right?

ANSWER: Regardless of any condition, under **no** circumstances shall the CAGE Code or drawing number be changed. Although there was no physical move, there is a "design activity transfer" from one CAGE Code to another, regardless of the lack of physical relocation. The rules for design activity transfer apply.

COMMENT: The addition of "design activity transfer" legends to the above drawings should be applied, but omission of the legends would have little or no effect on users. Real world economics and customer use should be considered for application of the transfer block for the question. But do not change the CAGE Code!

MORE COMMENT: One thing that must be remembered in the above condition is that when the drawings of one CAGE reference a drawing or part number of the other CAGE, the full "CAGE Code and part number" or "CAGE Code and drawing number" must be used for identification, and not part number or drawing number alone.

Q10. DESIGN ACTIVITY: During the mergers and selloffs of DOD industries, our corporation has merged with others and wound up with yet another DOD industry's drawings. Our new company CAGE Code, ironically, is on the drawings which we acquired and own, although the new name for our CAGE Code does not match the now obsolete company name for our CAGE Code that are on those old drawings. Obviously, there has been a major design activity transfer, and the rules of design activity would appear to apply. It is going to be very costly to apply the "Design Activity Transfer Legend" on the drawing per MIL-STD-100G to show the new name, as the legend must be incorporated by revision. Am I required to add the legend just to show a name change, even though the CAGE Code in the legend and the drawing title block will be the same?

ANSWER: There is no need for a transfer legend in this case. The original intent of the "rule", and the bottom line survival issue for drawing identification is the CAGE **Code** and drawing number. The company **name** is not used for identification for digital tracking, storage, retrieval, etc., and thus is a "nice to have" but not essential. In fact, minor name variations to major changes occur frequently in association with CAGE Codes but do not affect drawings and parts. In general, if there was no transfer of the drawing from one CAGE Code to a **different** CAGE Code, there was no "design activity transfer" within "real world" need and original intent, and there is no need for a "design activity transfer" legend to be applied. This will save the considerable cost of having to revise all of the "transferred" drawings.