

The proposed rule would appear to mandate the use of damage tolerance based lifeing methodologies on all structures. Initial certification permits other approaches to be used; for instance 25.571(c) permits initial certification by safe life methodology as an alternative to the use of damage tolerance techniques, and also engine structures have been certified under part 33 without the use of damage tolerance methodologies. The proposed NPRM, by mandating the use of damage tolerance without exception, is in conflict with initial certification requirements.

The use of means other than damage tolerance has resulted in excellent in-service experience for such components as engine mounts. Certification to part 33 and/or 25.571 (c), together with design provisions such as multiple loadpaths, good visibility of the mounts at each scheduled engine removal for overhaul, existing maintenance manual recommendations and field management programs, have been effective in preventing loss of loadpath capability for the engine mount system. The current approach to engine mount design and maintenance demonstrably provides an excellent standard of safety. It is GE's understanding that the NPRM was never intended to apply to 14 CFR part 33 certified hardware, according to discussions with the Engine & Propeller Directorate.

GE respectfully requests that the rule wording be modified, to clarify that structures certified by the safe-life approach or certified to FAR33 are not required to have inspection intervals developed based upon damage tolerance methodology.

The FAA responded to one of the previous comments, that the rule was intended to apply to "those parts and components of the primary structure of an airplane that are susceptible to fatigue and corrosion." GE requests that the FAA incorporate this clarification into the preamble or rule, so that the rule can be consistently interpreted. In particular, GE requests that it be clarified that propulsion system nacelle components are not included in the term "primary structure" as intended by this rule.