

## Launch Final Rule Issue Clarification Record

<b>1. Date:</b>
December 10, 2002
<b>2. Subgroup/FAA Person Seeking Clarification:</b>
Flight Safety System/Michael Dook
<b>3. Company/Industry Person Contacted:</b>
Lockheed Martin/Sri Iyengar 303-977-3211
<b>4. Issue:</b>
<b>Industry recommendation:</b> Apply the safety requirements (Part 417) only at non-federal launch sites. Maintain current requirements and implementation for licensed launches at federal ranges.
<b>5 Discussion:</b>
Mr. Iyengar was asked to elaborate on industry's reasons for recommending this approach. The following summaries Mr. Iyengar's points made during the discussion:  <ol style="list-style-type: none"><li>1. This approach should eliminate the cost concerns of launch operators that currently use federal ranges.</li><li>2. Licensing requirements for launch from federal ranges will remain unchanged without any negative effect on safety.</li><li>3. No change at the federal ranges therefore, no additional cost to current launch vehicle programs.</li><li>4. Would eliminate need to address major cost issues like grandfathering where "current practice" includes too many variables to be fully captured in the regulations.</li><li>5. Would allow demonstration of the common requirements without affecting current launch vehicle programs.</li><li>6. Would allow the FAA and AF to ensure and demonstrate that the requirements and implementation processes do not place undue burden on the current industry.</li><li>7. Once the government and the industry gain some experience with the proposed requirements and refinements are made, they could then be applied at the federal ranges with less likelihood of placing a major cost burden on current launch vehicle programs.</li></ol>
<b>6. Conclusion:</b>
Mr. Iyengar's input has been added to the public record and is being taken into

consideration as the FAA continues development of the proposed rule.