

Launch Final Rule Issue Clarification Record

1. Date:
January 16, 2003
2. Subgroup/FAA Person Seeking Clarification:
Flight Safety System/Michael Dook
3. Company/Industry Person Contacted:
Lockheed Martin/Sri Iyengar 303-977-3211
4. Issue:
Grandfathering
5 Discussion:
<p>Mr. Iyengar was asked to elaborate on his concerns with the grandfathering provisions proposed in the SNPRM. The following summaries Mr. Iyengar's points made during the discussion:</p> <ol style="list-style-type: none">1. Industry can not afford to revisit existing programs. The proposed approach, which applies grandfathering on a requirement-by-requirement basis would necessitate such revisiting to determine the extent of grandfathering for each program.2. There should be no caveats to grandfathering of existing programs. The AF has approved them. The FAA has accepted them through the licensing process. There should be no question as to whether they are acceptable just because the rule comes into existence.3. If the FAA conducted its own review of each program and issued a finding that the program is in compliance with the proposed requirements, that should significantly reduce industry's concerns. Any such review should not require any significant effort by industry.
6. Conclusion:
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.