

GE notes with concern that the FAA intends some future FAR 25 requirements to be retroactive - to "apply to design approval holders as well as to applicants for Part 25 design approval". This is a major departure from established practice, and it is not clear how it is to be enforced, who is to assume the burden of compliance, and what effect it will have on third-tier operators using airplanes no longer in production. We look forward to further discussion of this concept and the opportunity to discuss the safety benefits of a generic approach as opposed to the current, system of targeted Airworthiness Directives. We would be happy to assist in the cost-benefit analysis of this approach.