July 18, 2019

Mr. Michael Rucinski
Industry Engagement Manager – General Aviation
Policy, Plans, and Engagement
Transportation Security Administration
601 12th Street S.
Arlington, VA 22202

Dear Mr. Rucinski:

On behalf of the Aircraft Owners and Pilots Association (AOPA), I would like to thank you for the opportunity to provide our feedback about the Transportation Security Administration (TSA)'s effectiveness in the development and distribution of security policy and guidance through the recent TSA Policy Feedback Survey. I also appreciate you taking the time to follow up in person to discuss and exchange our views.

AOPA is a not-for-profit individual membership organization representing the interests of nearly 350,000 pilots and aircraft owners nationwide. AOPA's mission is to effectively serve the interests and needs of its members as aircraft owners and pilots, and to establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

Impact of Airport Security Requirements on General Aviation
General aviation plays an important role in the economic vitality in the U.S.—approximately 5,000 public-use airports and 15,000 other landing facilities that support nearly 200,000 aircraft and approximately 600,000 pilots. The Federal Aviation Administration (FAA) logs nearly 48 million instrument operations annually, of which general aviation accounts for more than 50%, including air taxis.

Of 20,000 airports and landing facilities, about 400 large airports with commercial services are regulated by the TSA. At those TSA regulated airports, general aviation pilots and operators sometimes face challenges because of the security requirements imposed on airport operators by the TSA. A review of 49 Code of Federal Regulation (CFR) Part 1542 shows that the TSA does not regulate general aviation airports or operations, except via a few security programs such as the DCA Access Security Program and Twelve-Five Security Program. However, TSA's security requirements for airport operators have both direct and indirect impacts on general aviation and create challenges for general aviation pilots.

Among these challenges, the issue with access to the air operations area (AOA) and aircraft parking area can be significant and has the most impact on both general aviation-based pilots and transient operators. These issues include airport media badge and escort requirements. AOPA is aware that each airport is unique and that the TSA works with the airport management to craft an Airport Security Plan (ASP) that fits that airport. However, it is unfortunate for transient and based pilots that AOPA and the public do not have access to the specific requirements that govern airport security, nor to finalized ASPs, because the information is considered Sensitive Security Information (SSI).

Concerns About Security Policy Development and Distribution Process
Under the current procedures of TSA policy development and distribution, general aviation operators do not have any opportunity to provide input on security policies for airports that could directly impact their operations. AOPA understands the necessity of special handlings of SSIs. Nonetheless, the impacts of security procedures on general aviation operators and operations must be carefully considered. We strongly believe that there should be a formal process where the industry and operators can provide input to minimize negative impacts.

In many instances, general aviation pilots are treated the same as airport employees or passengers, and placed under the same security requirements. Transient general aviation pilots may lack locally issued airport identification; however, in all cases these individuals hold an FAA pilot certificate as well as government issued picture ID, as required by the FAA. It is important to note that pilots are responsible for passengers' safety and security. In addition, as FAA certificate holders, general aviation pilots are vetted by the TSA on a daily basis, and non-U.S. citizens must go through extensive security threat assessments under the Alien Flight Student Program (AFSP) prior to initiating their flight training and before obtaining their student pilot certificate.

Conclusion
AOPA advocates for a risk-based approach to aviation security and has been very active in making efforts to maintain and promote aviation security for general aviation. The AOPA Airport Watch program launched in 2003 in partnership with the TSA; we are committed to educating general aviation pilots and operators. AOPA believes education and outreach are as important as compliance and can be more effective in reducing aviation security risks and increasing threat awareness.

AOPA most recently worked with the FAA to rewrite and improve the SIDA section in the Aeronautical Information Manual (AIM), a resource with which all pilots must be familiar. Please find attached a copy of the change. When this modified section publishes in August, it will be the first time the AIM will formally advertise the AOPA Airport Watch Program. We are committed to find further opportunities to collaborate with agencies, like the TSA, to improve our nation's aviation security. Pilots are already trained to be proactive for flight safety and outreach is one of the effective methods to increase security threat awareness among pilots.

We would appreciate that the TSA consider ways to solicit input from operators and conduct impact assessments when developing new security policies and procedures. We also strongly believe that the TSA should take into account that general aviation pilots are being vetted by the agency on a daily basis when developing new security reequipments. General aviation pilots and operators should be considered an important industry partner and a key part of security solutions as security at airports are important to all operators.

AOPA appreciates the opportunity to provide feedback on the effectiveness of the development and distribution of security policy and guidance. We look forward to future opportunities to work together to promote aviation security for general aviation.

Sincerely yours,

Nobuyo A. K. Reinsch
Director of Government Affairs, Aviation Security

Enclosure

AIRCRAFT OWNERS AND PILOTS ASSOCIATION