



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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November 14, 2007

Astrid C. Glynn, Commissioner
New York State Department of Transportation
50 Wolf Road
Albany, NY 12205

Dear Commissioner Glynn:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of more than 414,000 pilots nationwide, including nearly 15,000 in New York State – and I am writing to express our concerns about the security program being implemented at state-owned Republic Airport. As part of its security program, the airport is requiring all pilots and aircraft owners based at the airport to undergo three separate background checks, including one for criminal history. This requirement has caused considerable concern both within the pilot community and amongst businesses located on the airport. These requirements can only serve to limit access to the airport by legitimate users and represent an excessive set of security standards.

Earlier this year, AOPA staff participated in discussions with Republic management over vehicle access to the airport ramp and hangar areas. While we were concerned at the time that the proposed regulations exceeded the actual need for security, we were satisfied that, working with the pilot community, we were able to ensure that the rules adopted by the airport would continue to provide that access for pilots and aircraft owners.

At the same time, it seems that the measures being proposed now are far more appropriate to an air carrier airport, rather than one devoted to general aviation (GA) activity. The Transportation Security Administration (TSA) has laid out a framework for the required level of security at the variety of airports that serve our nation's aviation needs. These vary widely from the highly structured security at air carrier airports, to the guidelines for small GA airports that encompass the watchwords of the joint TSA/AOPA *Airport Watch* program, "Lock Up. Look Out.". In between, the TSA has recognized that one size does not fit all, and allows considerable flexibility for GA airports like Republic to "right-size" their program. There is no federal requirement for Republic Airport to institute the type of intensive security program that the state of New York has chosen to impose on the aviation community.

Typically, airport security programs for an airport like Republic would contain a number of reasonable elements, such as fences and controlled access, locked hangars, an *Airport Watch* program, lighting and CCTV, and several other items. But access control does not, and should not be construed to mean the unwarranted background check program being instituted at Republic. Federal authorities responsible for aviation security already regularly vet all pilots, obviating the need for a GA airport to institute such practices.

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While we can appreciate the airport's interest in restricting vehicular access, and even for checking the identity of pilots, we oppose this elaborate and invasive background check process. It should be sufficient to establish the identity of pilots and aircraft owners, and their need for access to the airport. As you know, every pilot is already required by federal regulation to have in their possession and available for inspection both their FAA issued pilot's certificate and a government-issued photo identification when they fly. In most cases, that additional ID is a driver's license, which can be easily used to establish an individual's driving privileges. Use of these government-issued documents should alleviate the need for the airport to engage in a series of costly and time-consuming background checks on a community that has already received significant scrutiny. The status of an Airman's Certificate is available at the FAA's website, and a driver's license can be easily checked as well.

Pilots and tenants at the airport have raised legitimate concerns about the ways in which their personal data is being gathered and disseminated and shared with other private individuals. Even pilots who have kept their aircraft at Republic for over 25 years are being forced to share their Social Security numbers with third-party firms, and can expect their personal information to be shared with private businesses from whom they receive services at the airport.

Before the airport management goes any further to implement these new security measures beyond the employee population, we strongly encourage you to rethink the rationale and need for these actions, reconsider the current requirements, and to choose a course that requires less invasion of privacy and fewer restrictions. As always the pilot and aircraft owner community is ready to work with you to develop reasonable standards that meet the legitimate security needs of the airport, while preserving easy access to general aviation. If the State and the Airport Management would be willing to hold the final implementation of the new security program in abeyance, I am certain that the pilot and tenant community would be willing to join a working group to develop solutions that would meet the legitimate security needs of the airport, while preserving a reasonable ease of access for the aviation community.

Thank you for your interest, and your support of general aviation. If you have any questions, or would like to discuss this matter personally, please do not hesitate to contact me.

Sincerely,



Gregory Pecoraro
Vice President
Regional Affairs