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Mr. John P. Sammon
Assistant Administrator,
Transportation Sector Network Management
Transportation Security Administration
U.S. Department of Homeland Security
601 S. 12th Street
Arlington, VA 22202

Dear Mr. Sammon:

Through our members, the Aircraft Owners and Pilots Association (AOPA) has learned about the recently released security directive (SD) that required changes to badging requirements and issuance at airports covered by TSA Regulation 1542. Although we don't have all of the details of the SD, we are concerned with its impact on general aviation pilots and aircraft owners that operate at TSA regulated airports.

Information from a number of TSA regulated airports make it clear that compliance with this SD will necessitate the badging and performance of a security threat assessment on tens of thousands of general aviation pilots that operate from these airports. While the TSA consulted with representatives from the airport industry prior to issuing the SD, no one from the general aviation community was contacted. This is unfortunate because we could have provided important insight into the effects of such action.

Without having the ability to completely evaluate the SD, and based on comments received from members affected by the changes, the directive appears to be inconsistent with definitions in the preamble and body of the 1542 regulation which clearly define the requirements and components of secure areas, SIDA, and AOA. These changes do not take into account the inherent difference between these areas and appear to negate the time-tested concept of time and distance. Additionally, application of these new requirements on all categories of airports does not reflect-real world scenarios at many Category II, III and IV airports where general aviation represents a majority of the activity and revenue.

On behalf of our 415,000 members, I respectfully request that you re-examine this security directive and allow the general aviation industry to work with TSA to develop acceptable alternatives that will not impose unreasonable burdens on airports or general aviation pilots. Hopefully, in the future we will be able to consult and provide feedback prior to TSA issuing such sweeping changes to regulations or procedures.

Respectfully,

Andrew V. Cebula
Executive Vice President
Government Affairs