

**c/o Russell Regional Airport
Rome, GA 30165
706-295-7835
706-234-8076 fax**

**Comments submitted by
GEORGIA AIRPORTS ASSOCIATION
in response to
TRANSPORTATION SECURITY ADMINISTRATION
NOTICE OF PROPOSED RULEMAKING
LARGE AIRCRAFT SECURITY PROGRAM**

Docket No. TSA-2008-0021

January 27, 2009

Georgia's airport system is an extremely important and valuable transportation resource for the state's residents, businesses, and visitors. Currently, there are 104 publicly owned airports in what we call the Georgia Statewide Aviation System. Of these 104 airports, 95 are General Aviation (GA) facilities that serve only private and corporate aviation. The other 9 airports provide for commercial or regularly scheduled airline service in addition to serving the interests of general aviation.

Of the 104 public airports in Georgia, 50 airports have less than 20 based aircraft. While representing all the airports in Georgia, the Georgia Airports Association (GAA) is a valuable and vocal state-wide voice for these smallest airports, because these airports do not rank high enough in the FAA's priority system to receive Federal funds. This makes the state's aviation program all the more important, since it is the state's program that provides the only source of funding for most airports.

In the NPRM **Summary**, the TSA recognizes that "There are thousands of GA airports that serve large aircraft." The "TSA considered the heavy burden involved for all these airports to adopt a security program." GAA contends that we are only as strong as our weakest link and that to impose these rules on "certain" airports would not fulfill the intent of the NPRM. An aircraft of 12,500 pounds or better is no more a threat departing from a reliever airport than an unattended GA airport with adequate runway length, of which there are many.

Section 1542.103 questions/concerns:

- 1 What is the definition of "regularly" in the context of "airports that regularly serve full program aircraft operators"?**
- 2 What is the basis for assuming that reliever airports are more vulnerable than unattended airports?**

Airport Security Coordinator questions/concerns:

At many general aviation airports, not everyone comes through the “front door”. There can be multiple FBO’s (Fixed Base Operators) on the field and multiple corporate hangars all of which are legitimates avenues for passengers to gain entry to aircraft.

- 1 Where is the line at which the *airport* operator ASC duties ends and the *aircraft* operator ASC begins?**
- 2 Would it not make sense for each individual FBO to have an ASC?**
- 3 Are Security Directives sent through both the *aircraft* operator ASC and the *airport* operator ASC, or is it the responsibility of the *airport* operator’s ASC to disseminate the information to tenants (FBO’s and flight departments)?**

By our estimates, the time involved in training, receiving, storing, and disseminating information by airports with very limited funding in today’s economic environment will not justify the benefit.

Law Enforcement Officer (LEO) questions/concerns:

Most general aviation airports (including relievers) do not have dedicated LEO’s on payroll and depend on local law enforcement for support.

- 1 To what extent do these local LEO’s need to be trained?**
- 2 Does the ASC need to retain these records (of which there could be dozens if not hundreds) or is it sufficient that the local law enforcement entity retain them?**
- 3 Who pays for any additional training?**
- 4 Do these LEO’s need to have the ability to drive on the airport? If so, that is additional training not accounted for.**
- 5 Does every LEO patrol car in the local law enforcement’s pool need to be equipped with a Ground Radio? Who pays for that?**
- 6 If using local support, what is a sufficient response time?**
- 7 It is stated that the “ requirement for these airports to implement security programs will not place a significant burden on local law enforcement agencies, because TSA expects that there will be few incidents requiring law enforcement response at these airports.” We submit that it is not the number of incidents that is burdensome, but the training and record retention involved for so few incidents.**

Procedures for public advisories questions/concerns:

As previously stated, at many general aviation airports, not everyone comes through the “front door”. There can be multiple FBO’s (Fixed Base Operators) on the field and multiple corporate hangars all of which are legitimates avenues for passengers to gain entry to aircraft.

- 1 Where then would it be acceptable to post public advisories when there are multiple points of entry and no centralized location under the direct control of the airport operator?**

Auditors for the Large Aircraft Security Program questions/concerns:

- 2 Will these third party auditors be able to charge an arbitrary fee? If so, there is no way to quantify what the cost of these audits will be.**
- 3 In today's economic environment, many airports are unable to meet day to day costs (including payroll) *without* adding any unfunded mandates. Without TSA bearing any of the costs, how are airports expected to bear the costs?**

Lack of Specific Threat

- 1 Has there been a specific threat to justify these new rules?**
- 2 It is a huge assumption on the part of TSA to suggest that "terrorists may view general aviation aircraft as more vulnerable and thus attractive targets." There is no evident basis for this assumption and it displays a lack of knowledge of how General Aviation works.**

We are not against a secure transportation system, but believe that this rule as written should be withdrawn completely. It is the suggestion of GAA that an Aviation Rulemaking Committee be formed. This committee should include representatives from the industry such as NBAA, AOPA, EAA, and AAAE.

Sincerely,

Hope Macaluso
Chair, General Aviation Security Committee
Georgia Airports Association