



NATIONAL AIR
TRANSPORTATION
ASSOCIATION

4226 King Street
Alexandria, Virginia 22302
(703) 845-9000 FAX (703) 845-8176

May 23, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh St., SW
Washington, DC 20590

**RE: Docket No. TSA-2002-11604; Final Rule – Security Programs for Aircraft
12,500 Pounds or More; Request to Extend Compliance Deadline**

The National Air Transportation Association (NATA), the voice of aviation business, is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state governments. NATA's 2,000 member companies own, operate and service aircraft. These companies provide for the needs of the traveling public by offering services and products to aircraft operators and others such as fuel sales, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, and scheduled commuter operations in smaller aircraft. NATA members are a vital link in the aviation industry that provides services to the general public, airlines, general aviation, and the military.

On February 22, 2002, the Transportation Security Administration (TSA) published the instant regulation in order to meet the deadline specified by Section 132 of the Aviation Transportation Security Act of 2001 (ATSA). More commonly referred to as the "Twelve-Five" rule, this regulation requires all commercial operators of aircraft weighing 12,500 pounds or more, including Part 135 on-demand air taxi businesses providing cargo and passenger service, to incorporate a formal security program by June 24, 2002. On April 22, 2002, NATA submitted comprehensive comments to this docket regarding the "Twelve-Five" program.

Tomorrow marks only one month remaining before these operators must have their security program in place under the regulation. However, the TSA has yet to release a "boilerplate" program to the affected segment of the aviation industry for it to review and implement.

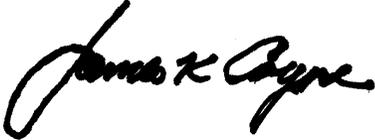
Generally, the DOT has considered 30 days as a minimum amount of time for certificate holders already subject to security regulations to implement required changes in their programs. Additionally, it is customary to allow operators an opportunity to submit comments whenever any program changes are proposed. In this instance, it appears that fewer than 30 days will be available for these businesses to review, comment on and implement security steps never before required of them.

This industry has been forthcoming in its attempts to discern its obligations under the "Twelve-Five" rule and provide TSA with any information requested, and NATA has regularly met with TSA officials to discuss the program and industry concerns. In response and to their great credit,

TSA staff have been responsive to our inquiries and have made themselves available to the industry.

Nevertheless, NATA remains concerned that sufficient time for affected operators to review and implement this regulation is not available. As NATA wrote in our April 22, 2002, formal response to this docket, we look forward to working with TSA and its staff to develop and implement a body of regulation which accomplishes Congress' and the agency's objectives while preserving the unique flexibility, security and safety that is one of the hallmarks of this industry.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. Coyne". The signature is written in a cursive, flowing style with a large initial "J".

James K. Coyne
President