



November 26, 2002

Docket Management System
Attention: Docket No. FAA-2002-11666
U.S. Department of Transportation
400 Seventh Street, S.W. (Nassif Building)
Room 401, Plaza Level
Washington, D.C. 20590-0001

Re: Comments Concerning Final Rule FAA-2002-11666

Dear Sirs:

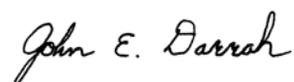
I am writing on behalf of the Allied Pilots Association (APA) to applaud your ongoing efforts to enhance security in the field of aviation. The immediate passage of FAA Rule 2002-11666 is a necessary first step in this process.

I share the same concerns that both the TSA and the FAA have with regard to the effectiveness of this rule over a long period of time, given the current climate of additional and continuing terrorist threats. Unfortunately, the secondary proofs of identities to be used in concert with the Airman's Certificate represent very low levels of security for credentialing documents. This form of double credentials even falls well short of the relatively low tech credit cards now readily available which include digital pictures, pin numbers, embedded signatures and holograms. While the short-term efficacy of the final rule may help to a very limited degree in establishing a pilot's identity, ultimately this system could also be abrogated through identity theft and rests on the unsure footing of easily counterfeited secondary documents.

Therefore, I strongly encourage the FAA to continue its reconsideration and total upgrading of the airman certification system as required by the Aviation and Transportation Security Act (ATSA). The creation of a continuing, accessible database of certificated airmen that includes a biometric measure, would greatly enhance cockpit security, reducing the prospect that cockpits would be breached by non-certified persons.

APA appreciates your consideration of these issues and the timeliness with which your agency is acting upon such measures.

Sincerely,



Captain John E. Darrah
President