AIR LINE PILOTS ASSOCIATION, INTERNATIONAL
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November 27, 2002

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

Subject: Picture Identification Requirements, Final Rule and Request for Comments

Dear Sir/Madam:

The Air Line Pilots Association, International (ALPA), which represents more than 66,000 airline pilots who fly for 42 airlines in the U.S. and Canada, has reviewed the subject final rule.

ALPA supports the rule as an interim step, and is recommending that its members ensure that they are carrying in their immediate possession government-issued photo identification, per the rule's provisions.

We believe that the rule will provide a virtual no-cost, albeit marginal, enhancement to security. ALPA wholeheartedly agrees with the TSA and FAA that "these measures [do not] address fully the concerns reflected in the DEA Act or ATSA." In addition to the problem of information on FAA airman certificates not matching the information on other identification media, state driver's licenses are notoriously easy to forge. There are even Internet sites that specialize in developing phony driver's licenses and other documentation. Relatedly, there is no good way to verify that the true identity of the bearer is represented on the driver's license, because a biometric such as a fingerprint or iris scan is not stored on these cards.

ALPA has long recognized the problem of inadequate identification of aviation industry employees and was, until September 11, 2001, the sole promoter of the Universal Access System. The DOT's Transportation Worker Identification Card (TWIC) is intended to create an inter-modal ID card for use by the aviation and other transportation industries. However, its future is dependent upon congressional appropriations, decisions made by the new Department of Homeland Security (DHS), and politics, to mention a few noteworthy variables that will delay its implementation.

Regardless of how or whether TWIC is implemented as has been proposed, there is a genuine need for better pilot identity verification than is afforded by this rulemaking. ALPA urges the FAA to work with the DHS and TSA in the development of a highly secure identification media that can be used to positively identify the entire pilot population.

Thank you for the opportunity to review the final rule and provide comments to it.

Sincerely,

Jerry Wright

Jerry Wright, CPP
Manager, Security & Human Performance