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**Federal Aviation Administration,  
Office of the Chief Counsel,  
Attention: Rules Docket (AGC-200)  
Docket Number FAA-1998-4758, - 7  
800 Independence Avenue, S.W.  
Washington, DC 20591.**

1999 FEB 23 A 9: 07  
OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET**Dear Sirs,**

Having studied the (NPRM) in co-ordination with concerned departments (Marketing/Finance/Flight Operations). The following are the highlights of our comments and observations:-

**PART - I. OPERATIONAL AND FINANCIAL IMPACTS ON SV FLIGHTS WITHIN THE US AIRPORTS.**

1. There will be a financial impact on the implementation of the FAA Security Program as outlined in the NPRM. An initial study shows that the cost would be around US\$.1,678,000.00.
2. **Saudia** also will have to bear the cost of additional security staff, such as (GSC) who has to be directly hired by the carrier.
3. **Saudia** will bear more cost in respect of security training as the airline security department will have to arrange under its direct supervision for a professional security training program to train both the station employees and contractor staff in-order to fulfill the new FAA requirements. This additional cost would be difficult to figure out at this stage.

4. Check-In Counter Facility.

The new regulations will have substantial marketing impact in terms of flow of passengers, both on the counter side and the departure gates. We have to keep in mind that carriers are sharing very limited terminal facilities yet with an escalating lease charges every year. Upon the implementation of such security procedures, the designated areas of **Saudia** will have to be increased which will definitely involve more expenses.

5. Sterile Area

Generally speaking the existing layout of passenger terminals at **JFK & IAD, WAS** was not originally designed to incorporate additional security requirements as proposed in this NRPM, especially for X-ray equipment and explosive detectors. This will definitely cause a great difficulty in the implementation of the proposed security requirements which is beyond the control of air carriers.

We propose that the FAA reconsider the subject matter in-order to come up with reasonable and pragmatic way of implementation. We suggest that FAA will have to study **first** the capabilities of passenger terminals within US Airports. The airport authorities at each airport will have to take the responsibility of setting up a security plan that serves all carriers operating **from that** terminal comprehensively which includes:

- common check points for passenger hand/checked baggage
- integrity of sterile areas
- access control systems To/From the **airside**
- security surveillance under the **aircraft** etc.

In my opinion to have qualified and standardized security measures for all carriers, the airport authorities will have to provide the all airlines with the basic airport security measures (passenger screening/hand and hold baggage check/aircraft security) as most International Airports do. Security charges may be levied on airlines for such services.

**PART- II. THE IDENTICAL SECURITY MESURES REQUIRED  
BY FOREIGN AIR CARRIERS OPERATING TO THE  
UNITED STATES.**

The implementation of this part of the plan also involves “additional cost” to foreign carriers operating to U.S. Airports. For this issue FAA will have to discuss the matter with Saudi Civil Aviation Authorities (**PCA**). **Saudia**, is not directly involved in the implementation process of the standard security measures within the Kingdom of Saudi Arabia.

*Chief*

  
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**YOUSUF A. WALI**

cc: **VP** – Audit & Security  
AGM-Avn **Sec** & OOK Stns.