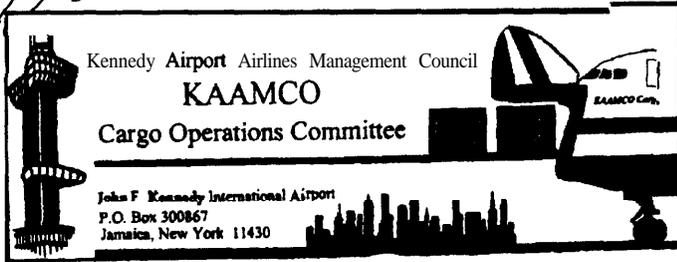


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March 6, 2000

RESPONSE TO: US. Department of Transportation Dockets
Docket No. FAA-1 999-6673 - 8

KAAMCO
CARGO OPERATIONS COMMITTEE

FAA NOTICE OF PROPOSED RULEMAKING - CERTIFICATION OF SCREENING COMPANIES

SUMMARY

The FAA proposes that certification will be required for all companies performing security screening, this would include security screening companies, domestic air carriers, indirect air carriers, and foreign air carriers, when performing their own security screening. The rulemaking proposes that the certification will incorporate measures to improve performance measurements and testing requirements for security screeners.

This certification would also include all companies, including carriers, and indirect air carriers, that perform security screening for cargo.

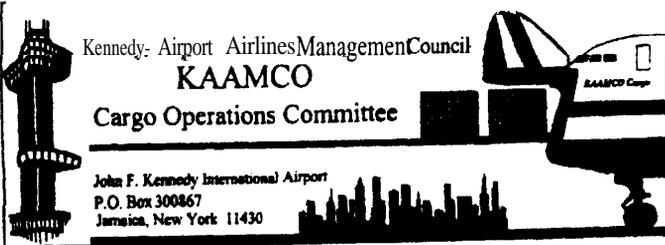
The following is just a brief overview of some of the major proposals in the rulemaking:

/While screening companies would share the responsibility with the air carrier for screening, the ultimate responsibility would reside with the air carrier. If the air carrier or indirect air carrier conducts it's own security screening, the responsibility of course, still remains with them.

//The responsible party for this performance is also required to conduct oversight of the company, be itself, or the screening company. Audits would be one of the tools to conduct oversight.

///All screening companies that are certified, would have to submit standards for the performance/operation/training/staffing/of their screening operations in a security program.

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DEPT. OF TRANSPORTATION
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////All air carriers, indirect air carriers, would have to submit standards for the screening companies that are certified, in their Standard Security Program, or Model Security Program.

////Screening companies would be required to have qualified management/technical personnel/instructors, with minimum experience and training standard.

COMMENTS

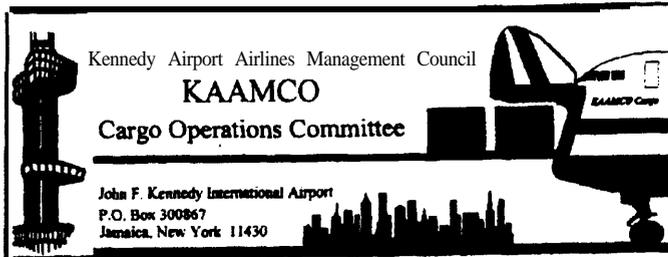
Under the proposed rule, if implemented, the rule would impose significant new costs, and responsibilities, both on the air carrier and indirect air carriers.

It has been mentioned, that screening responsibilities would be borne by both screening companies and carriers (and indirect), which would result in both assuming more burden, irrespective if it uses an independent company or it's own employees for screening purposes. For example, carriers holding a screening certificate, would still have to perform oversight functions on their own employees and any independent screening company that they may use. Additionally, all the requirements that would be required in the carriers security program to assure certification, would also be again needed, even if they use a separate screening company, creating double the burden.

According to the proposed rule making, a cargo handler would no longer be permitted to physically search a shipment, unless, the handler has met all the standards, training, requirements, etc., that the certified screening company, or air carrier conducting the screening, are required to adhere. If an air carrier, or indirect air carrier, wanted to be certified, to use a cargo handler, the carrier or indirect air carrier, would have to submit the completed certification application package to the FAA, with all the required data, including incorporation, tax identification, **organisation** charts, etc., etc., All is requiring additional manpower and paper keeping requirements.

To further address physical screening, if we read the proposed amendment correctly, there is a time limitation as far as it concerns physical screening notification. According to the proposal, the FAA must be notified of our intent to physically screen **45** days prior. **We** assume this is a blanket notification, for all future screening, not a requirement for actual notification each and every time we physically screen. This needs further clarification from the FAA.

Additionally, we feel that the cargo **organisations** will have many problems with respect to requirements for screeners as it pertains to x-ray systems. Currently, the only training available to our cargo **organisations**, as it pertains to screener training, would be from those providing training for passenger screeners. As you know, there are major



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- Polar Air Cargo
- Professional Courier Service, Inc
- Ramsell Plaza Hotel
- Revel Air Maroc
- Revel Jordanian Airlines
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- Transit Aviation Services
- Ultimate Aircraft Appearance Corp
- United Parcel Service
- Varia Airlines
- Vital Security Services, Inc
- World Flight Services

differences between cargo and passenger screening, and at this point in time, training in cargo screening is either limited as far as support, or possibly non-existent in some areas.

Again, to x-ray screening, the screener trainee would have to complete **40** hours of On The Job Training, and pass a FAA approved test, before being able to exercise independent **judgement** as a screener. In the present cargo environment, screening application, are not continuous, therefore the **40** hours of **OJT** would be difficult to attain.

CONCLUSION

Currently, our cargo **organisation** including carriers and indirect carriers are in compliance with their submitted and approved FAA Standard and Model Security Programs, as it effects cargo. Both the carriers and indirect carriers, would need to expand considerable resources to maintain and incorporate the proposed sections into their current approved security programs to remain in compliance with the proposed rule making concerning certification of screening companies.

The **KAAMCO** Cargo Committee acknowledges that the FAA proposal is designed to improve the existing requirements by certifying screening companies, however the proposed document in it's current form must be **re-examined**.

We would also like to work with the FAA to develop cargo screening alternatives that are specifically designed around FAA security objectives yet are not necessarily the re-application of passenger baggage screening methods.

Passenger safety is everyone's concern and we'd like to make sure that the cargo screening methods put in place **maximises** the effect of airline security.

Sincerely,


 Michael Buckley
 Chairman
 KAAMCO Cargo Committee