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March 23, 2000

DEPT. OF TRANSPORTATION
DOCKETS

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MEMORANDUM

TO: U.S. Department of Transportation, Federal Aviation Administration

FROM: Ronald C. Young, Airport Police Supervisor
Billings Logan International Airport

SUBJECT: *DOCKET NO. FAA-1999-6673* - ¹⁰ (*CERTIFICATION OF SCREENING COMPANIES*)

We certainly agree with the FAA's efforts to require all companies performing aviation security screening to meet enhanced requirements and be certified by the FAA. In addition, we agree the airlines should be the entity that oversees and insures that the requirements are being met. After reading the proposed rulemaking we would like to offer the following comments:

On page 225, **111.201 Screening of persons and property (c) (1)**. We support regulation that allows both uniformed and non-uniformed armed law enforcement officer be exempt from the screening process. Certain AVSAC Alert levels require plain cloths police officers be within several areas.

On page 227, **111.205 Employment standards for screening personnel**, the education requirement for screeners fade from requiring a high school diploma to "a combination of education and experience that the screening company determines sufficient." In our opinion, this is not a minimum education requirement; this allows screening companies to hire the same as they do now. We feel there should be at least a high school education requirement. Higher education requirements brings higher wages that would add stability and reduce turnover.

On Page 231, **111.211 Screening company instructor qualifications**, instructors need only 40hrs (one week) experience as a security screener to be an instructor. They are required to pass a knowledge test however, that can be waved by the administrator. From these low requirements, it appears that the time and experience needed to become an instructor has been set to facilitate the high turn over that is associated with most screening companies. We feel that these qualifications should be raised.

On page 234, **111.215 Training test** paragraph (e) it states that each test administered under 111.215 has to be monitored by an employee of the carriers for which it screens. We read this to say that, if a screening company screens passengers for several different airlines each one would be required to have an employee present during the testing of every screener hired. It may be better for smaller airports that have a single screening area that is shared by multiple airlines if one airline would monitor the tests as a representative of all the airlines. It could be rotated through the different airlines on a monthly basis so that all the airlines would share the burden.

In addition, we feel the airline representative should have Ground Security Coordinator (GSC) status.

On page 15 New **advanced screening technology** refers to the use of computer based **training (CBT)** and threat image projection (TIP) to focus on the human element of screening. These systems are currently being used in some larger airports to help ease the work load of FAA inspectors. We feel that this new technology should be utilized in the smaller remote airports where FM visits are less frequent. In our area for an example, the screeners are only **tested** once or twice a year by the FAA and with the high turnover of screening personnel we feel **this** is not adequate.

In closing, we feel that minimum education requirements, FAA certification, and frequent **testing** with the use of CBT and TIP are key in enhancing the security screening process.

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