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Aviation Security - (Focusing on Training & Retention of Screeners)

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On behalf of International Total Services, also known as ITS, I would like to preface my remarks by stating that our company is in complete and total support of a certification process. That said, I would like to take this opportunity to address our concerns regarding the applicability of the proposed certification process as it pertains to our company specifically.

Our concerns include:

- I. Loss of Control Over Training Process
- II. Critical Delays in Training Due to Background & Drug Testing Results
- III. Partner vs. Secondary Recipient Role
- IV. CBT Training
- V. Clarification on Disabilities and Civil Rights Categories
- VI. Certification Guidelines
- VII. Financial Burden

I. Loss of Control Over Training Process

Because we frequently operate in environments short of necessary personnel, we need to be extremely flexible and aggressive in our scheduling of training classes and testing sessions. If we need to delay such training and testing until an airline employee is present to oversee these sessions, it will only create additional employee shortages and delays on the checkpoints.

II. Critical Delays in Training Due to Background & Drug Testing Results

In the current environment, ITS simultaneously obtains documentation to verify background histories and drug testing results while the students are in the initial stages of training. The requirement that states that no training could be initiated until all background histories and drug testing results are completed will inevitably lead to enormous delays in the training process. This element of the proposed certification process works in direct opposition against our often critical need to fill open lines at the checkpoint. Additionally, it positions us in an "at risk" environment as it relates to our ability to fulfill FAA mandates as they currently stand.

III. Partner vs. Secondary Recipient Role

In a shared environment (accountability), we need to be considered, at the very least, an equal partner in this certification process. This means that companies like ITS need to receive material directly from the FAA versus being the recipient of selected or interpreted material from the airlines. It makes sense that as the certificate holder, we would need to receive all information directly from the FAA to avoid miscommunication or the accidental oversight in information transmission.

Along these same lines, it is also necessary that companies like ITS should be able to gain approval directly from the FAA for modifications to our training programs, rather than having to obtain preliminary approval from the airlines. Again, as the certificate holder, we may, in many cases, be able to more quickly recognize what is needed in terms of implementation as it relates to full compliance with all FAA mandates.

IV. CBT Training

While we certainly understand the requirements of the English language capability, a more flexible approach is necessary to allow for a positive instructor/student environment. The approach offered by the NPRM certification guidelines suggests that CBT would be applicable in all circumstances. Many screeners have little to no experience with personal computers, including senior citizens who make up a large percentage of our work force. A "point-and-click" environment could be difficult for many employees who otherwise, under different testing circumstances, understand the material/content of the testing. Additionally, many screeners may not have a level of fluency in the English language necessary to process the standard CBT format.

V. Clarification on Disabilities and Civil Rights Categories

ITS needs clarification on the specific requirements for the American Disabilities Act and Civil Rights categories so that we can wholly fulfill the comprehensive requirements of the 1) FAA, 2) DOT, and 3) ADA. On a "going forward" basis we would need these Federal Government entities to work closely together to ensure that all training requirements are easily understood by providers to accomplish the following:

- guarantee that training programs can be designed, implemented, and integrated with relative speed;
- serve the full intent of the law.

vi. Certification Guidelines

In that ITS serves approximately 108 airports in the United States, comprising approximately 80% of the commercial facilities, we are very concerned about the certification process in terms of site-specific enforcement. Additionally, in the rare instance when de-certification might prove applicable, the re-certification process must be thoroughly and clearly explained. Given these concerns, we ask the following:

- We request that the FM provide detailed information relative to their internal hierarchy to 1) facilitate the intent of the certification process and 2) clearly define the areas of responsibility. This could be accomplished via organization charts defining areas of direct responsibility.
- In view of the time constraints associated with the training requirements outlined in the certification guidelines, we request that current employees be "grandfathered" into their positions, rather than retrained under the formal certification guidelines for new employees.
- if retention of a service provider certificate is predicated on overall TIP performance, definitive guidelines must be established prior to implementation of the program. This will preclude an overly subjective approach to acceptable performance.

VII. Financial Burden

Given the precedent that has been set with regard to costs for trace detection equipment, and in view of the \$22-24 million previously stated as applicable to the certification process (TIPS), one question weighs heavily:

- is it reasonable to expect that federal funding can be anticipated with regard to future costs associated with equipment upgrades?

In the absence of federal assistance, it is felt that the financial implications of the certification process may well deal a debilitating blow to aviation security as we know it,