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Eugene, Oregon 97402

DEPT OF TRANSPORTATION

00157-3 PM 1:00

U S Department of Transportation Dockets  
Docket No. FAA-1999-6673-26  
400 Seventh Street, SW.,  
Room Plaza 401  
Washington, DC 20590

4/25/00

To Interested Parties;

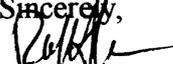
This letter concerns the proposed Certification of Screening Companies NPRM. Our company provides screening services at the Eugene Oregon Airport. I have personally overseen the program for 26 years, currently supervising a staff of 20 with an average tenure of 4.75 years.

I would never be opposed to any policy that would raise the bar a little higher and benefit the traveling public and our airline clients. Certain facets contained in the Proposed Rules I see as being very beneficial, such as prohibiting interference with screening personnel during the course of their duties.

Overall, I do not feel that great inroads would be gained from such sweeping changes. I have always felt that more cohesiveness between the airlines, airports, security companies and the FAA in a more pro-active, same-team manner would be quite a boon to the program. I realize that as the operator at a small airport that I probably have certain control standard advantages that are not as readily obtainable in larger venues, but from my own personal standpoint, it appears that in order to effect these standards in those larger venues that I am going to have to pay in terms of an incredible amount of additional administration costs.

One particular item in the proposed changes that I am vehemently opposed to is the required forwarding of screener and supervisor training records. From a business owners perspective, these records, while subject to a host of inspection and retention criteria, are a legitimate asset. I put a lot of blood, sweat, tears and money into each properly trained screener. In theory, why should a competing company be able to forego the thousands and thousands of dollars in training expense that I have put out while underbidding my company and acquiring my trained personnel?

I firmly believe the what is needed in many respects to upgrade the overall security program is simplification, not more administration. The packet containing the proposed rules changes exceeded 50 pages. ACSSP's have been amended so many times that they are difficult to follow, and would be easier to teach from and interpret if a simpler format was adopted.

Sincerely,  
  
Robert Heilman