

DEPT. OF TRANSPORTATION  
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**UNITED EXPRESS**

May 1, 2000

U.S. Department of Transportation Dockets  
Docket No. FAA-1999-6673-30  
400 Seventh Street SW., Room Plaza 401  
Washington, DC 20590

Dear Sirs:

Great Lakes Aviation submits this letter of comments in response to the proposed changes to 14 CFR Part 111 concerning the Certification of Screening Companies. There are items in this proposed change that we acknowledge will help to improve Screening Checkpoints, but other items have an unfavorable effect on the efficient operation of existing Checkpoints. The items that we would like to address are those that have the greatest affect on the small regional carrier. Great Lakes Aviation presently provides service to 55 Category III and IV airports and in those airports we, staffed with our own Customer Service employees that have been trained to do screening, operate 39 of the checkpoints. With this in consideration we ask that you review to what end some of these proposed requirements are beneficial and necessary to checkpoint operation.

**III.H. - 111.109 / Screening Company Certificate**

Proposed for existing screening companies is an application for provisional certificate. **After** the provisional certificate is received the company would subject to "a rigorous application process" to achieve certification.

*Screening Companies that have been successfully operating screening checkpoints and are in good standing with the FAA and the airlines they serve should be "grandfathered" in as acceptable companies. These companies would provide the FAA with the required operational information and be issued a Screening Certificate. In follow up inspections the FAA would insure that the company remains in compliance with FAA regulations.*

The effective date for the final rule is 60 days after its publication in the Federal Register.

*60 days is very unrealistic due to the complexity of this change.*

**III.P. / 111.209- Screening company management**

Proposed each screening company have a Screening Performance Coordinator. **SPC** would be required to complete Initial Security Screening Training Course, including X-ray interpretation and FAA exam. **SPC** would also be required to have

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1 year of supervisory or managerial experience within the last 3 years in a position that exercised control over any aviation security screening required under Part 108 or 109.

*Take into consideration that airlines that perform their own screening should be able to determine who the individual is and what the requirements will be for the individual that oversees their security program, i. e. existing Directors of Security. These are generally individuals that are already handling all aspects of security for the airline and are capable of managing the operations of checkpoints without completing themselves the initial screening course, x-ray interpretation and FAA exam.*

### III. Q./111.211 - Screening company instructor qualifications

Screening instructors would have to have a minimum of 40 hours of actual experience as security screeners and pass FAA screener knowledge/performance test.

*The instructors at Great Lakes Aviation are trained by the Customer Service Training Department to be able to conduct classes covering a variety of information. These are airline employees that are knowledgeable in many areas of the industry. They teach the classroom portion of Passenger/Cargo Screening from a standardized curriculum that they know and understand explicitly. The requirement for the 40 hours and test will put an unnecessary time and record keeping restraint on an already extremely busy department.*

### III.R./111.213- Training and knowledge of persons with screening-related duties

### III.S./111.215- Training tests: requirements

Proposed to train personnel to pass specific tests developed by the FAA.

*We are opposed to test being developed by the FAA. A standardized test would leave no flexibility to focus on the areas important to our Category IV airport checkpoints. We would need extensive focus on x-ray and manual search and limited focus on Explosive Detection Systems, which are in the distant future for many of our stations. Questions concerning LEO support with a twenty (20) minute response time and use of alternate staffing procedures are other examples of areas that we must ensure complete understanding from our screeners, but that would probably not be a focus of an FAA test. We need to be able to control our own testing.*

Each carrier would be required to provide a test monitor during screener testing.

*We are opposed to this requirement. Providing the screening company with an airline employee each time they do testing is an unnecessary staffing burden. The*

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*checkpoint itself should be held responsible for their operation with the airline providing the existing audits.*

- III.T./111.217- Training tests: cheating and other unauthorized conduct  
Verbiage to include information to emphasize that cheating is not tolerated.  
*All of the information is good as background information for screening companies to format their testing program. The sentence that states FAA special agents would regularly monitor screening company testing is very unrealistic considering that they only visit our checkpoints on an annual basis.*
- III.U/111.219- Screening letter of completion of training  
Letters of completion would be issued to screeners, SIC and CSS upon completion of initial and recurrent training.  
*This is unnecessary duplication of the same information that is provided in required training records. This requires the cost of the actual certificates along with the clerical manpower to issue the certificates. Certificates although a nice gesture do not act as a motivational incentive and should be an “optional” item.*
- III.V./ Screener and supervisor training records  
Screening company would be required to forward training records for screening personnel to another screening company upon the request of the employee.  
*Screening companies should not be required to forward training records to another company, but should have the option of doing this.*
- III.W./111.223- Automated performance measurement and standards  
Requires the use of Threat Image Projection for each X-ray and Explosive Detection System.  
*The whole requirement statement for the installation of TIPS and ETS is very unclear. The FAA states that these items will be required for all U.S. locations, but vaguely imply there will be exceptions. Where does the Category IV airport checkpoint fit in this plan. Great Lakes Aviation has several checkpoints with very low activity where TIP's and ETS equipment is not necessary. For example, Manistee, MI checkpoint has approximately 100 people passing through the checkpoint on a monthly basis. Why would there be a requirement for TIP's at this type of station? This group needs to be considered during the formatting of this change and not after it is put into place. The burden of processing exceptions should not be on the screening company, but apart of the original plan.*

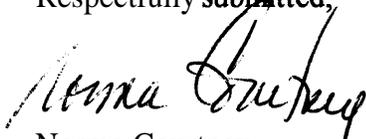
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The three main issues we have in acceptance of this document are:

- Consideration for existing Airline Screening Companies vs. Contractor Screening Companies. The personnel, curriculum and operation of a checkpoint operated by an airline is different than that of a company that is “in the screening business”
- Consideration for small regional airlines that operate mainly at Category IV, low activity airports.
- The need for Cargo Screening to be combined with passenger screening at places where both are conducted at the same checkpoints, by the same screeners.

This change needs further examination and input from the screening companies and the airlines. We would suggest that each **CASFO** meet with representatives from their regions to discuss in detail the affect of the change. These problems can be addressed together and a more workable document can be presented for this change.

Respectfully submitted,



Norma Courtney  
Director of Security  
Great Lakes Aviation