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**Globe Aviation
 Services Corporation**

6220 N. Beltline Road
 Suite 200
 Irving, Texas 75063
 (972) 550-0711
 Fax: (972) 518-1551

Gene R. Empey
 Vice President-Marketing

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**Department of Transportation
 Federal Aviation Administration .
 Docket No. FAA-1999-6673-36
 400 Seventh Street SW, Room Plaza 401
 Washington, DC 20590**

DEPARTMENT OF TRANSPORTATION
 FEDERAL AVIATION ADMINISTRATION
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Attached you will find Globe Aviation Services Corporation response to the Notice on Proposed Rule Making for Screening Companies. The questions are intended to enlighten us on the overall impact of the rule change. At this stage some areas are unclear as to our involvement in the processes as proposed.

These questions are being electronically transmitted with a hard copy to follow via overnight delivery.

Please give me call should you require further information, or clarification on our questions. Globe Aviation looks forward to being an active participant with the FAA on **this critical process.**

Gene Empey
 Vice President Marketing
 Globe Aviation Services

Questions – Notice on Proposed Rule Making for Screening Companies Globe Aviation Services

1. Training requires a carrier employee be present for each test. Are the carriers required to attend and sign off on all classes? We run at different times of the day including evening shifts and weekends.
2. The FAA is developing automated training and testing programs that will require computer in all stations. Who will provide these computers?
3. Measurement is based on TIPS testing. What about other aspects of the operation, such as **mag, ETD etc**? Will measurement analysis be available to the vendor directly **from** the FAA? Or will we receive **from** the carriers? In locations with more than one tips machine, what is being done to consolidate into one station report?
4. What are the performance measurements benchmarks? What number determines acceptable performance? Will the FAA and carrier benchmarks be the same? Will the screening companies have any input on the development of measurements?
5. Who has final say on screening companies, we currently report to as many as three different entities in a single location. This would include the carrier(s), the FAA, and now some airports are requiring we meet with their certification processes.
6. Although not covered in the **NPRM**, the employment and background check process has a major impact on our operation. We support Senators Kay Bailey **Hutchison's** drive to use an extensive criminal history verification, opposed to the current process. It does not matter if someone has had 5 jobs, although it does matter if they have a criminal history. Will the screening companies have any input into this complex area? Will this area (employment practices, and overall record keeping) have any impact on the certification/de-certification process?
7. The **NPRM** requires that each screening company location have a screening performance coordinator (**SPC**). Who pays for this, or is this considered a cost of doing business borne by the screening company? Are the listed **SPC** qualifications mandatory minimums or recommended guidelines?

Questions – Notice on Proposed Rule Making for Screening Companies
Globe Aviation Services
Page 2

8. Will contractors be **fin**ed directly **from** the FAA, opposed to the third party that simply writes the checks with limited input currently? Will contractors be able to litigate LOI's directly with the FAA?

9. The current and proposed information process does not work. We are left to rely on the carriers to provide FAA information, revisions, etc. This simply does not work. Example: Change 56 to the ACSSP, outlining numerous revisions, was never received from the airlines or ATA. After pleading with the FAA we finally received on 4-26-00. Change 56 becomes effective 5-1-00 (4 days notice). This is unacceptable. We must have a direct line to the FAA and receive information directly from the FAA in a timely fashion.

10. Transfer of the original training records to another vendor or carrier, may pose a potential legal problem. Contractors need to retain originals.

11. Will the screening companies have any input in establishing employment standards, training programs, and technical personnel standards and training?

12. How will the FAA equally judge screening companies if each one operates on their own unique screening program? This is further compounded with differences in interpretation within the ranks of FAA agents now using one standard security program.

13. Would the FAA control the screening companies on a local, regional or national basis?

14. The increased costs to the **screening** companies, while still unknown, will be substantial. How will the screening companies be able to recoup these costs?