

My comments come with the following background:

30+ years in aviation, 20+ years in airlines, 6000 pilot hours, certificated aircraft dispatcher, former airliner captain, 5+ years as air carrier Director of Safety.

Conceptually, it is my considered opinion that the Federal Air Marshall program should establish a parallel Reserve program that permits interested persons to be hired, trained and qualified as deputy FAMS. They would serve when and where their 'regular' jobs permitted but would, by policy, have to serve a minimum amount to remain qualified. (I have not, in these comments addressed whether these persons would be paid; my expectation is that they might be paid on a 'per trip' basis, but the matter of pay is not of crucial importance in these remarks.) These persons could include active airline pilots and other crewmembers, non-Federal law enforcement officers, and other interested persons. Highest priority would be given to reviewing the applications from crewmembers and LEOs.

In this context, then, I will respond to the questions asked by FAA. All my responses will be in the context of pilots/crewmembers as legitimate 'reserve' (deputized) FAMS.

1. Whether pilots and other flight crew members should carry firearms of less-than-lethal weapons, and if so, whether it should be on a voluntary basis; [comment: Assuming the question can be broken into two parts (and the 'of' is a typo and should be 'or'), then I consider that those crewmembers voluntarily trained and qualified as 'deputized, reserve FAMS' should be permitted to carry firearms onboard aircraft when seated in the cabin acting as FAMS, and should be permitted to carry firearms on the flightdeck when performing crewmember duties when permitted by the employing airline. Non-FAM flightdeck crewmembers should be permitted to carry less-than-lethal weapons only when trained and qualified by the employing airline under Federal guidelines.]

2. Whether and how the weapons should be stored on the aircraft or carried on board;

[comments: for firearms of a qualified FAM, as required by the policy of the FAM program specific to flightdeck carriage. For less-than-lethal weapons, based on the recommendations of experts on this subject matter (SMEs).]

3. The types and numbers of less-than-lethal weapons that should be carried on aircraft for use by qualified flight deck crew members;

[comments: as recommended by SMEs.]

4. The types of restraining devices or other kinds of equipment that should be on aircraft;

[comments: as recommended by SMEs.]

5. The types and numbers of firearms that should be carried on aircraft for use by qualified pilots and the types of ammunition;

[comments: as recommended under the FAM 'reserve' program for flightdeck carriage. Essentially, this would be dictated by the presence of a 'reserve FAM' operating as a flightdeck crewmember. The number and type of weapons/ammo for that FAM would be as assigned by the FAM program policy.]

6. The amount and type of weapons training that we should require, including whether there should be initial and recurrent training.

[comments: For 'reserve' FAMS -- as defined by the FAM program. For less-than-lethal weapons under an airline program -- per SMEs.]

7. How the less-than-lethal weapons and firearms should be carried, stored, maintained (if necessary), and accessed on the aircraft.

[comments: For 'reserve' FAMS -- as defined by the FAM program. For less-than-lethal weapons under an airline program -- per SMEs.]

8. What types of aircraft modifications we should require when aircraft are equipped with less-than-lethal weapons or firearms, such as modifications to ventilation or avionics systems;

[comments: none known]

9. Whether the qualifications for using less-than-lethal weapons or firearms should be integrated into the existing systems for establishing and maintaining airman qualifications, such as pilot certificates and ratings;

[comments: As to firearms carried by qualified 'reserve FAMS', no integration into air carrier or other aviation qualification or continuing qualification programs. As to less-than-lethal weapons sponsored by the air carrier, yes, it should be

integrated into the security portion of the crewmember training program for qualification and continuing qualification.]

10. The circumstances under which less-than-lethal weapons may be used;
[comments: Guidelines contained within the air carrier FAA-approved program driven from SME recommendations incorporated into agency guidance to participating carriers.]

11. How to identify individuals who are willing to provide emergency services on commercial flights;

[comments: permit them to be 'self-identified'; hold EMT qualifications, or other qualifications as recommended by SMEs. This would be similar to the guidelines for permitting medical professionals to use the existing onboard EMKs.]

12. Whether to maintain a registry of some or all of these individuals;

[comments: Registry is impractical if not impossible.]

13. The minimum qualifications of those who would provide emergency services on commercial air flights;

[comments: Determined upon recommendations from emergency-medicine SMEs.]
and

14. The type of training providers of emergency services on commercial air flights should have.

[comments: Determined by qualifications recommended by emergency medicine SMEs.]

The above comments are submitted by me personally and not on behalf of any carrier.
doug myers