



NATIONAL ARMORED CAR ASSOCIATION, INC.

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Docket Management System
US Department of Transportation
Room Plaza 401
400 Seventh Street SW
Washington, DC 20590

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These comments are being submitted on behalf of the National Armored Car Association (NACA). The association represents the nation's major armored motor service carriers, many of whom utilize the nation's air transportation system to transport currency and valuables across the United States.

Our industry not only services depository institutions and commercial accounts, but most significant, the Federal Reserve System and the Bureau of Engraving and Printing. We are proud of the service we provide daily to keep the lifeblood of the American economy circulating.

Our members agree that persons with access to secure areas at airports ought to be subjected to fingerprint-based criminal history reviews. In fact, our crewmembers have been through such background checks. In most instances, these checks have been conducted by the state officials responsible for granting weapons permits or other licensing requirements.

We urge that the regulation be amended to exempt persons with state permits or licenses if those permits were granted following a review of the FBI criminal history records. This will reduce the burden on airport operators and avoid duplicating the federal records check.

Please contact me if you have any questions.

Sincerely,

Michael Gambrill
President