

148845



San Francisco International Airport

January 18, 2002

P.O. Box 8097
San Francisco, CA 94128
Tel 650.821.5000
Fax 650.821.5005
www.flysfo.com

Federal Aviation Administration
Dockets Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590

Re: Docket No: FAA-2001-11172 -4

DEPT. OF TRANSPORTATION
DOCKETS
02 JAN 22 AM 11:50

Dear Sir/Madam:

San Francisco International Airport has reviewed the proposed procedures for airports to seek reimbursement for allowable security costs imposed by the FAA or TSA on or after September 22, 2001. SFO offers the following comments for your consideration.

Section 154.17 of the proposed procedures provides that claims for reimbursements must be supported with "normal invoices, vouchers, payrolls, and supporting accounting records." SFO anticipates that in response to security directives from the FAA or the TSA, detection machines or other types of security equipment will have to be purchased. It is likely that the purchase of the equipment would be through a purchase order for which invoices or payments would occur after March 31, 2002. In order for these types of costs to be eligible for reimbursement, we suggest that the rule be expanded to allow other evidence that security costs have been committed to on or before March 31, 2002, including purchase orders or other type of contracts for the purchase of eligible goods.

The Aviation and Transportation Security Act requires 100% explosion detection system screening of checked bags at airports by December 31, 2002.. Airports will need to make improvements to the airport facilities, such as the replacement of baggage conveyor systems and reconfiguration of terminal baggage areas, in order to accommodate these systems. However, under the proposed rule, capital costs are not eligible for reimbursement (Section 154.3). Restricting these costs to AIP reimbursements could cause delays or cancellations to other necessary airport projects that are dependent on AIP funding. Even if funding for security-related capital projects is not available at this time, capital costs should be considered for eligibility if additional funds subsequently become available.

Thank you for the opportunity to comment on the proposed rule.

Sincerely,


John L. Martin
Airport Director

- AIRPORT COMMISSION
- CITY AND COUNTY OF SAN FRANCISCO
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- HENRY E. BERMAN PRESIDENT
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