



January 15, 2002

The Honorable Jane Garvey, Administrator
Federal Aviation Administration
Docket Clerk, U.S. DOT Dockets, Room PL-401
U.S. Department of Transportation
400 Seventh Street, SW
Washington DC 20590-0001

**RE: Docket No. FAA-2001-10999
Criminal History Records Check**

Dear Administrator Garvey:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I respectfully request a 45 day extension of the period in which the public may file comments on the above captioned rulemaking implementing criminal history checks of all individuals with unescorted access to the Security Identification Display Area (SIDA) of an airport. TTD's 34 member unions¹ represent several hundred thousand airline employees who are covered by the requirements embodied in the Criminal History Records Check program. Our member unions affected by this new rule have long been concerned about safety and security and can offer a great deal of expertise on how best to implement these proposed changes.

Unfortunately, the unusually short comment period provided by the FAA prevents us from providing substantive input on the final rule. For that reason, and to ensure that improvements in security and due process are achieved in the final rule, we will need an extension of time in which to file comprehensive comments in this important proceeding.

Thank you in advance for your consideration of our request. We look forward to working with you on this important aviation security matter.

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a horizontal line extending to the right.

Edward Wytkind
Executive Director

¹ Attached is a list of TTD's affiliated member unions.

cc: David Leitch, Chief Counsel, FAA



TTD AFFILIATES

The following labor organizations are members of and represented by the TTD:

*Air Line Pilots Association
Amalgamated Transit Union
American Federation of State, County and Municipal Employees
American Federation of Teachers
Association of Flight Attendants
American Train Dispatchers Department
Brotherhood of Locomotive Engineers
Brotherhood of Maintenance of Way Employes
Brotherhood of Railroad Signalmen
Communications Workers of America
Hotel Employees and Restaurant Employees Union
International Association of Fire Fighters
International Association of Machinists and Aerospace Workers
International Brotherhood of Boilermakers, Blacksmiths, Forgers and Helpers
International Brotherhood of Electrical Workers
International Brotherhood of Teamsters
International Longshoremen's Association
International Longshore and Warehouse Union
International Organization of Masters, Mates & Pilots, ILA
International Union of Operating Engineers
Laborers' International Union of North America
Marine Engineers Beneficial Association
National Air Traffic Controllers Association
National Association of Letter Carriers
National Federation of Public and Private Employees
Office and Professional Employees International Union
Professional Airways Systems Specialists
Retail, Wholesale and Department Store Union
Service Employees International Union
Sheet Metal Workers International Association
Transportation • Communications International Union
Transport Workers Union of America
United Mine Workers of America
United Steelworkers of America*

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