



AIRCRAFT MECHANICS FRATERNAL ASSOCIATION

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INTERNET FILING

Docket Management System
U.S. Department of Transportation
400 7th Street SW
PL-401
Washington, DC 20590

RE: Docket FAA 2001-10999

To Whom It May Concern:

On behalf of the 11,000 aviation technicians employed by 4 airlines in the United States, the Aircraft Mechanics Fraternal Association submits these comments regarding Docket No. FAA-2001-10999, Criminal History Records Check.

AMFA supports the criminal history checks for technicians who are hired after the effective date of the rule. However, for those technicians who were employed prior to the effective date of the rule, we believe there is no need to incur undue expense and hardship to an airline employee with a history of proven service. The regulation makes no exceptions if an employee has a conviction of a listed crime but the facts are compelling that the employee is not a security risk.

Furthermore, it appears there is no due process for a technician who has previously reported a conviction during the 10-year period. In that situation, the technician was currently a certified airman with all the responsibilities and authority that the certification requires but under the new rule the technician will not be allowed access to airport secure areas, thus what was once a promising career now ends in failure.

The rule should, at minimum, provide a procedure for a due-process evaluation of each individual convicted technician.

We appreciate this opportunity to comment on the proposed rule, and we respectfully request that our comments be adopted in any further amendments to the rule.

Sincerely,

Frank Boksanske AMFA National Safety and Standards Director