

In reference to:
PETITION FOR RULEMAKING
Regarding the Aviation and Transportation Security Act, Public Law 107-71
Dated February 21, 2002
Submitted by Phil Boyer, President, AOPA

Mr. Boyer's petition to the FAA that would require pilots to carry some form of official photo ID (driver's license, passport, etc.) in lieu of placing photographs on airman certificates, addresses a serious gap in aviation security. However, even assuming those "official" forms of identification were fraud-proof, the proposal overlooks many plausible scenarios where fraud could still be conducted. The most serious inadequacy in the current airman certificates is the ease with which a forger could duplicate and alter the rather pathetic "cut along the dotted lines" form we are currently issued.

Mr. Boyer's proposal would not prevent someone from forging an airman's certificate in their own name, or in the name of an assumed identity, and then presenting an authentic state-issued driver's license along with their forged airman's certificate. Under those circumstances, there is little if anything an FBO could do to determine the authenticity of the airman certificate, particularly if the forger assumed the identity of someone who actually possessed a valid certificate. The easy availability of databases that reveal the names of all active airmen to anonymous queries (including one on line that is provided by the FAA itself), make already licensed pilots easy targets for this form of identity theft. The fact that most airman certificate numbers are the airman's social security number only simplifies the process of determining an airman's certificate number through the common methods that are already in use to conduct identity theft.

Mr. Boyer's proposal would do nothing to prevent someone who possessed a driver's license in any name, enough flying skill to pass an FBO flight check, and a rudimentary knowledge of how to use a computer scanner from gaining access to aircraft as a licensed pilot. In the interest of both aviation security and the integrity of my own identity, I have no objection to paying a nominal fee to receive an airman certificate that bears my photograph.