

To whom it may concern,

I am writing to comment on Docket no.TSA-2002-11604 Security Programs for Aircraft 12500 pounds or more. As I read the before mentioned document, I just could not understand the logic of the proposed law. As a 135 charter operator, I just cannot understand what is trying to be accomplished by this law.

Regarding the twelve five program, I have two items for you to consider. First, why are 135 operators being targeted instead of all operators of 12500 aircraft? There are easily as many, if not more, private operators of these aircraft. 135 operators are already required, under the Pilot Records Improvement Act, to collect employment information, driving records, and FAA certificate records for any pilot we use. Private operators do not have this requirement. Because of the insurance requirements for pilot flight time and qualifications, a 135 charter operator is far less likely to use an unknown person with questionable qualifications and low experience. It seems to me the private operator is much more likely to have staff problems and for that matter passenger problems than a 135 operator.

Second, what is meant, exactly, by restricting access to the cockpit? Many light and medium sized business aircraft have no provision for restricting access to the cockpit. A curtain does not exactly provide much protection. If some type of door or reinforcing is required, this will mean considerable expense for an already strapped industry. Once again, the question of why this applies solely to 135 operators, instead of all operators, is a mystery to me. Most aircraft over 12500, that are privately owned, are operated as company aircraft. These aircraft could have any number of people coming and going from them that are not known to the crew.

Finally, how will these rules affect fractionally owned and operated aircraft. This area is probably the most serious threat of all. The fractional industry operates aircraft as large as a 737. This industry has no regulation except that of part 91. They operate domestically and internationally. Who is regulating them? What security must they have? Executive Jet alone operates probably three hundred aircraft over 12500.

These are things that need to be considered before this law is enacted. I am all for more secure flying. I am a pilot and the Director of Operations of a charter company. I want flying to be safe, but believe we need to legislate from our heads not our hearts. Simply throwing any old law at a problem will not fix it.

Anton Coy
Director of Operations
Epps Air Service, Inc.
1Aviation Way
Atlanta GA 30341