



NATIONAL ARMORED CAR ASSOCIATION, INC.

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March 22, 2002

Mr. John Delcampo
Transportation Security Administration
Department of Transportation
Washington, D.C. 20591

Docket: TSA 2002-11602

RE: 49 CFR Part 1548

These comments are submitted in behalf of the National Armored Car Association (NACA), which represents the nation's largest armored car companies. Our members serve as contract carriers for the federal government and major financial institutions. Our customers include the Federal Reserve Banks, the Bureau of Engraving and Printing as well as both money center and regional commercial banks. We move the nation's money.

As contract carriers, our companies know our customers. We do not accept shipments from the public on a walk-in basis. The opportunity for an unknown person to introduce a dangerous substance into the cargo does not exist. We provide customers with secure transportation and guarantee safe, timely delivery.

The shipments we carry are sealed by the institution prior to our receipt and delivered to their destination unopened. Decades of experience have shown this to be the most secure method of delivering currency. To open these shipments would expose both the armored car company and the air carrier to substantial liability. Imposing a requirement to open cargo would seriously impede this critical commerce, as we doubt the Federal Reserve would agree to such searches.

We are, of course, cognizant of the Transportation Security Agency's concern about cargo on passenger aircraft. Airline scanning of shipments in a manner similar to how passenger luggage is handled would be an acceptable alternative.

The armored car industry works extremely closely with the Federal Reserve to assure that currency is available where it is needed. We responded to the urgent call of the FED to distribute currency immediately following September 11, just as we did in preparing for the millennium. It is essential to the nation that we be able to continue to transport the nation's currency in an efficient and secure manner.

Sincerely,

Lawrence Sabbath
Executive Director

