

General Comments:

1. Is the TSA going to provide a sample program to Part 135 Operators that the operator can use to create their program?
2. How long will it take to get approval?
3. What will be the deadline for getting the approval?
4. Does the FAA have regulatory oversight of this program for enforcement and help?
5. 1544.101(e) (2) mentions meeting the requirements of other provisions of subparts C, D, and E that TSA has approved. What are these provisions and does the TSA request them or does the Operator request them?
6. How are Part 135 operators expected to meet the requirements of having a Ground Security Coordinator at each airport? We literally serve hundreds of airports without any advance notice. Is it possible for the Captain of the flight to perform this function?
7. 1544.219 seems to conflict with FAR 135.119 in that a Part 135 operator may allow passengers or crew to carry a weapon. If 1544.219 overrides 135.119, is 135.119 being revised prior to implementation of this rule?
8. 1544.223 seems to allow an Air Marshal to ride along on a Part 135 flight. Due to the on-demand nature of Part 135, how would this be accomplished?
9. What guidance will the TSA provide in helping the Operator develop a training program? Does the TSA approve or accept the training program?
10. 1544.230 requires that each flightcrew member have a fingerprint based CHRC. What process is going to be provided to allow the Operator to use the FBI for this check? Or, is the check to be administered by another law enforcement agency? How long will these checks take?
11. 1544.230(b) requires this check to be made prior to the operator allowing that individual to serve as a flightcrew member. Does this mean that the Operator can conduct training while the check is being processed by the FBI but just cannot activate that individual on the line until after the check has been completed?
12. 1544.301 refers to a contingency plan. Is the TSA going to provide a sample plan for operators to use?
13. 1544.303 requires the immediate notification of the flightcrew when a threat is received. If the operator does not have the ability to communicate with the flightcrew during flight, how can the Operator comply with this requirement?