

Comments on TSA-2002-11604

This proposed rule needs to be developed further and clarified. Due to the extreme vagueness of these rules, the implementation date should be pushed to a later date.

- Must we, as an air carrier (Part 121 or 135) have our program approved, and if so, by whom (FAA, TSA, DOT, etc.)?
 - *Will this require a change in Operation Specifications?*
- Applies to operations in aircraft with a certificated takeoff weight of 12,500 pounds or more; in scheduled or charter service carrying cargo, passengers, or both; and not currently required to have a security program.
 - *Why “12,500 pound or more”? Aircraft certification rules have always stated more than 12,500 pounds.*
- Designation of Operator, Aircraft, and Ground Security Coordinators (§1544.215)
 - *Can the PIC be designated as the Ground Security Coordinator?*
 - *Qualifications for employees?*
- Program must include regulations on carrying firearms onboard an aircraft and when the air carrier must carry a Federal Air Marshall (FAM).
 - FAR §135.119 already states information regarding carriage of weapons
- All employees must receive training on the implemented security program
 - *Guidelines for content, length, or format?*
- Fingerprint-based Criminal History Records Checks (CHRC) for Flightcrew Members, as defined in FAR §1.1 (§1544.230)
 - *Flight Attendants are excluded from this rule?*
- Flight Deck Privileges (§1544.237) - Operator must restrict access to flight deck for each aircraft that has a door.
 - *If the aircraft has no cockpit door, does this rule apply?*
- Each operator must adopt a contingency plan (§1544.301)
 - *What items should the contingency plan contain? Guidelines?*
- Develop procedures for bomb/air piracy threat inspection and notification (§1544.303)
 - *Regulation calls for “immediate notification” of the pilots even while airborne. How can this be accomplished?*