

1. TSA has promised to provide operators with a boilerplate program that may be used to develop the operator's security program. With just two months remaining before operators must have approved programs in place, we are concerned that TSA is not leaving operators with enough time to properly implement the new programs.

2. The TSA regulation as written requires a GSC at every airport where a covered flight departure occurs. As many on-demand operators may serve thousands of airports and landing areas around the world, such a requirement would devastate the industry. We support allowing the pilot-in-command to perform any ground security requirements.

3. We oppose any measures that would isolate the crew behind a locked cockpit door from the passengers for safety reasons. Most on-demand aircraft are not equipped with emergency egress for the crew from the flight deck nor would pilots be able to provide direction to passengers in an emergency if a locked door were present.

4. As written, operators are required to "immediately notify" flight crewmembers when a threat is received. Most Part 135 operators do not have, nor are they required to have, the air-to-ground communications necessary to comply with this mandate. We support amending this provision to state that, "if possible," the operator will immediately notify the flight crewmembers of the threat.