

This comment is in reference to the security program known as the twelve-five program. This addresses aircraft 12,500 lbs. and over. Castle Aviation happens to have one aircraft that weighs 12,500 lbs., and one pilot that flies that airplane. This is the only airplane in our fleet of eight that falls under this category. If the rule was made as all the other rules that addresses aircraft over 12,000 lbs., Castle Aviation would not have to comply with this regulation. As of today the template program is not available, therefore we cannot develop our operators security program as required. FAA regulations address aircraft 12,500 lbs. or less and over 12,500 lbs. I strongly suggest a change in the wording so it is the same as the FAA regulations. Ground security coordinators require a GSC at every airport. I certainly think this should also be changed to allow the pilot in command to perform any ground security requirements. Other issues are the flight deck door, which many part 135 aircraft either do not have and if they do have it, creates a bigger problem because most 135 aircraft do not have emergency egress from the cockpit. The other issue is immediate crew notification of threats. This is also a concern because we do not have direct communication with the cockpit. I do not have a problem with additional security measures; safety has always been our number one concern, but it should not durastically change how we do business. The concern that I have outlined can be easily accomplished by making sure that all regulations in all government agencies address the problems in the same manner. Thank you for your attention. -Michael H. Grossmann