

In regard to the twelve-five program, I have the following concerns.

1. To date a boiler plate program for affected operators has not been released. It is extremely important that we get this information if we are to comply with the June 24, 2002 implementation date.
2. The rule should be revised to be applicable to aircraft weighing more than 12,500 in order to more closely resemble FAA Regulations.
3. The requirement to have a Ground Security Coordinator at each airport is not possible. An acceptable method of compliance would be for the Pilot in Command to act as the Ground Security Coordinator.
4. Smaller aircraft are not able to limit access to the flight deck due to emergency egress concerns as well as isolating the crew from the passengers in the event of an emergency.
5. Immediate Crew Notification of Threats. This part of the regulation need to be changed to require the operator to notify the crew if possible. It is sometimes impossible to contact the flight crew.

In conclusion, I must note that this new program will be just more regulatory burden on our industry while doing little to enhance safety. I believe that the current regulations provide for an adequate level of security. In short, if it's not broke, why fix it.

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