

Coalition of Airline Pilots Associations

**1101 Pennsylvania Avenue NW
Suite 6612
Washington, DC 20004
202-756-2956
fax 202-756-7509**

November 26, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street SW
Washington, DC 20590-0001

RE: Docket No. FAA-2002- 11666

Dear Sir:

The Coalition of Airline Pilots Associations (CAPA) is grateful for the opportunity to have its views considered on important matters such as those contained in this new regulation.

CAPA is a trade association representing the pilots of American Airlines, Airborne Express, AirTran, Southwest Airlines, and United Parcel Service. We have 22,000 members in all.

CAPA has no objection to requiring pilots to carry and present photo identification; we see it as a very preliminary step in the right direction.

The Allied Pilots Association, the union representing the pilots of American Airlines, and one of our constituent members has filed its own comment on this proposal. CAPA adopts those comments as its own. We have additional comments.

The step taken by this rule is a very small one, and we hope more steps will follow promptly. CAPA does not understand how a driver's license paired with a pilot's license enhances security in the airline context. It is our conviction that the FAA proposal of March 12, 1990 (55 FR 9270) should have been finalized long ago. We note that yet another law in addition to the DEA Act and the Air Transportation Security Act has been passed that urges action on pilot identification. Section 1403 of the Homeland Security Act provides:

‘(3) ISSUES TO BE ADDRESSED- The procedural requirements established under paragraph (1) shall address the following issues:

‘(K) Methods for ensuring that security personnel will be able to identify whether a pilot is authorized to carry a firearm under the program.

‘(L) Methods for ensuring that pilots (including federal flight deck officers) will be able to identify whether a passenger is a law enforcement officer who is authorized to carry a firearm aboard the aircraft.

Pilots will begin training under the act within three months.

The TSA is now working on a proposed system called the “TWIC” that is to be a universal high tech identity verification system. That system may make it unnecessary for the FAA to develop its own system for pilots and FAA personnel. Unfortunately, implementation of that system remains a long way off. We hope the FAA would join us in urging the TSA to begin that program sooner rather than later using off the shelf technology. We would also urge the TSA to issue the first cards to those who currently have no secure verifiable means of identification. That would include all those with access to the cockpit and all those who travel armed. Obviously that would include FAA inspectors. All these people are mobile. Airport issued identification simply isn’t a viable solution fore them. Secure verifiable identification of these categories of people would address a very real security risk.

Thank you for considering our views.

/s/ Michael P. Cronin
Executive Director
Coalition of Airline Pilots Associations