

Ref. Sec. 129.28 FlightDeck Security.....Paragraph C states that there is an exception to the Rule for "newly manufactured airplane on a non-revenue delivery flight". International Lease Finance Corporation is the World's largest aircraft Lessor with over 600 aircraft in its fleet...We regularly ferry aircraft to and from the U.S. for maintenance purposes. We would like the Rule to be revised to include an exception similar to the one for newly delivered aircraft. The Rule should be revised to state that the exception is for any newly manufactured or U.S. company owned "aircraft on a non-revenue flight for delivery". Foreign operator's are required to provide passport information to the TSA department prior to getting any overflight permits anyway, so security is maintained by the fact that the foreign operator cannot operate without prior security background checks performed by the TSA.

Thank you for your consideration and if you have any questions, please feel free to contact me at 1-310-788-1999.

Sincerely,

Richard Poutier  
Vice President  
International Lease Finance Corporation