This rule as proposed makes a mockery of serveral cornerstones of American justice. First, there is every possiblity that subject persons will not actually be informed of the reasons for their suspension/revocation. Even in the current, and some will argue demostrably flawed, administrative law process used by the FAA the accused have a right to see the evidence against them and to confront their accusers. No such guarantees are provided by this rule.

The appeal process under this rule is less fair than the current model at the FAA. At least an airman or other certificate holder has the right to appeal to the NTSB. Under this proposed rule all review takes place within the confines of the TSA. This immediately raises grave concerns about fairness and equity of the proceedings.

None of this should be construed as denial of TSA's or FAA's statuatory authority to suspend and/or revoke airman and other certificates. Nor am I proposing in these comments that any such certificate actions should be suspended in their application while the appeal process is ongoing. While I do have concerns about these issues, my primary concern is that subject persons should have the right to see the evidence against them, confront any accusers, and have recourse to a speedy and impartial appeal. When a person has, in all probability, been denied their livelihood by the government guarantees like these are a small price to pay.