

I wish to express my most emphatic objection to this rule on several bases:

- 1) The rule establishes primacy of the Transportation Security Administration over the FAA in determining the final disposition of the validity of an FAA certificate.
- 2) The rule establishes penalty for suspicion of intent to commit a crime, and does not maintain a standard of an assumption of innocence.
- 3) The rule does nothing to actually limit the ability of one suspected of being a terrorist threat to perform an act of terror, and has the potential to restrict the mobility and exercise of private or professional priveleges to those innocent of any crime.

The rule seems to be based on the faulty logic that a terrorist will be prevented from committing an act of terror if he no longer possesses the legal means to pilot an aircraft. As a terrorist act is an illegal act in itself it is naive to think that a terrorist would be prevented from piloting an aircraft because he does not possess a valid license. In addition, since terrorists of late have shown themselves willing to die in the commission of their acts, and thus escape prosecution for their acts, the imposition of this law does little to add penalties or provide an effective deterrent to the commission of any terrorist act.