

As both a security and emergency manager, I would like to offer the following comments:

1. Retain the existing system of placarding. RATIONALE: As your own RSPA study advised, altering this system would undermine the advances it has produced that presently expedite the ability of emergency responders to deal effectively with the toxic hazards being transported.
2. Develop and present to affected shippers a better understanding of the design basis threat against which they are to defend. This would include postulating a few credible scenarios and a profile of antagonist(s) and tactics against which you expect new security measures to defend. RATIONALE: The better a defender understands the adversary, the more effective the defender's countermeasures will be.
3. Shift some of the emphasis away from imposing additional requirements to fostering frequent regional coordination for tracking and response. RATIONALE: Proliferation of requirements takes on the appearance of unfunded mandates which drive a compliance mentality that emphasizes sanctions after the fact. A comparable emphasis on regional coordination to track affected shipments in a collaborative environment would foster better communication between shippers and law enforcement responders. It would also mitigate threats by compressing reaction time. One way to do this would be to engage shippers in performing frequent drills with police agencies as an alternative to producing an overabundance of written documents that can one day be used for post mortem compliance audits. This approach would stimulate awareness and cooperation while reducing bureaucratic resistance.

Very truly yours,

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Security and Emergency Manager