The International Air Carrier Association (IACA) represents 31 airlines whose main market is the leisure industry, many of which have major operations to the U.S.A. The Association welcomes the opportunity to comment on the Interim Final Rule on the Aviation Security Infrastructure Fee issued on February 2, 2002. Our members are concerned that the U.S. is imposing additional cost burdens on both its own airlines and those of other countries at a time when commercial aviation can least afford to bear them. IACA agrees with the Air Transport Association (ATA) in its contention that civil aviation is a national security issue and that the responsibility of funding aviation rests with the federal government. It is IACA's opinion that requiring commercial aviation to bear security costs will be counterproductive to the U.S. government's objective of restoring U.S. and world travel and tourism to their pre-September 11th levels. Furthermore any costs imposed for security must be fully transparent in their application, being seen to be both equitable and reasonable.

IACA is aware that a number of submissions have already been received by the Department of Transport from other sources, principally from ATA, and therefore hesitates to be repetitious, being in agreement with the arguments within those submissions. However, we do wish to emphasize that we are of the opinion that:-

1. The imposition of an infrastructure fee will be premature until a comprehensive cost analysis has been conducted.
2. That Appendix A is wholly impractical as the costs involved were, at the time of operation, not separated from others that had no relationship whatever to U.S. security. Furthermore, the costs involved in attempting to develop a formula to determine those cost and then to determine the costs themselves using that formula would be prohibitive, diverting resources away from attempts to restore the industry to financial viability.
3. That, as the TSA has not as yet assumed all screening functions, the cost of those functions should be excluded from the infrastructure fee.
4. That more information should be provided to foreign airlines on the costing of U.S. Sky Marshals. This is to ensure that non-U.S. airlines are not bearing part of the cost of U.S. Sky Marshals operating on U.S. aircraft.

In conclusion, IACA is of the opinion that it would be precipitant for TSA to impose the infrastructure fee until it has conducted a full and transparent cost analysis. Only then will it be in a position to determine the fees for individual airlines based on their use of TSA screening facilities and personnel.

On behalf of the members of IACA may I thank you for your kind consideration.