TSA Large Aircraft Security Program Statement

Statement of John F. Betsill, Jr.,
Airport Support Network Volunteer, Aircraft Owners and Pilots Association

Transportation Security Administration: Large Aircraft Security Program, Other Aircraft Operator Security Program, and Airport Operator Security Program Proposed Rule

Docket Number TSA-2008-0021

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9:00 AM

Location: Renaissance Concourse Hotel, One Hartsfield Centre Parkway, Atlanta, GA

My name is John Betsill, and I am a commercial pilot, flight instructor, and aircraft owner. I also serve as Airport Support Network volunteer at the new Paulding County [Georgia] Regional Airport (KPUJ) for the Aircraft Owners and Pilots Association ("AOPA"). AOPA is a not-for-profit individual membership organization of more than 413,000 pilots. Representing three-quarters of all pilots in the United States, AOPA is the largest civil aviation organization in the world. AOPA's mission is to serve the interests of its members as aircraft owners and promote the economy, safety, security, utility and popularity of flight in general aviation aircraft. General aviation encompasses all of aviation with the exception of the commercial airlines and the military.

Paulding County Regional opened in November of 2008 and is still under development. KPUJ is the first jet-capable airport to be built in Georgia in over 30 years. As such, it is destined to become a major general aviation reliever airport for the Atlanta area. That goal, however, will be more difficult to attain by applying airline security standards to individual aircraft owners and operators under Part 91. The proposed rule does not take into account the inherent differences between commercial air travel and private operations, nor does it explain why less intrusive measures – like the joint AOPA/TSA Airport Watch program - could not achieve comparable levels of security.

KPUJ has the potential to enhance the economic development of Paulding County and the surrounding area. That potential will be curtailed by imposing costly and burdensome operational requirements on aircraft owners and operators. For instance, the proposed biennial third-party audits would be costly to operators, who will have to pay unsubsidized, market rates for audits that should be conducted, or at least paid for, by the government. Further, no system for auditor accountability exists, and the proposal lacks critical information on how operators will be able to challenge audit errors.

General aviation affords the same type of economy and utility in private air operations as private vehicles do in land transportation. To impose commercial operational procedures on private flying would effectively end that economy and utility. AOPA members have made it clear in a survey and in comments to the Association that they are concerned by the attempt to make GA aircraft over 12,500 lbs. flown under Part 91 comply with the same security requirements as commercial carriers.

While time allotted for this statement precludes me from addressing the specific areas requested by TSA in the Federal Register Notice announcing these meetings, AOPA will be addressing these and other issues raised in the NPRM in their final comments to the docket:

1. The proposed rule represents an unprecedented intrusion on general aviation because it would apply commercial standards to GA operations.
2. AOPA also is concerned about the proposal because the TSA has provided no justification for setting the aircraft weight requirement at 12,500 pounds. The association fears it could expand to all sizes of GA aircraft.
3. Equally alarming is a requirement that aircraft operators use and pay for third-party auditors to perform a government function.

AOPA does not support the NPRM as currently drafted, and requests that TSA withdraw or reconsider the proposed rules, focusing - in partnership with industry - on developing logical and cost-effective solutions that will continue to enhance general aviation security.

I thank you for the opportunity to voice our concerns.