

TSA Large Aircraft Security Program Statement

Statement of:

Fred Fourcher, President Orange County Pilots Association and member of 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

My name is Fred Fourcher and I serve as President of the Orange County Pilots Association with 200 members and I am also a member of the Aircraft Owners and Pilots Association known as the 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.

At my home base, the Orange County Airport, the TSA is proposing background checks and badges for the hundreds of GA pilots that use the facility. This along with the LASP would inflict a crushing burden on GA at the Orange County Airport and would accomplish little if anything from a security standpoint. Other sectors of transportation such as trucks have been used by terrorists and are not being targeted by your aggressive security rules, yet General Aviation has not been used and is being unfairly targeted under your proposals.

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 announcing these meetings, AOPA will be addressing these and other issues raised in the NPRM in their final comments to the docket.

The proposed rule represents an unprecedented intrusion on general aviation because it would apply commercial standards to GA operations. 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. 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.