



October 30, 2008

The Honorable Edmund "Kip" Hawley  
Assistant Secretary  
Transportation Security Administration  
601 South 12<sup>th</sup> Street  
Arlington, VA 22202-4220

**RE: Docket Number TSA-2008-0021, Large Aircraft Security Program, Other Aircraft Operator Security Program, and Airport Operator Security Program**

The Aircraft Owners and Pilots Association (AOPA), and the National Business Aviation Association (NBAA) represent the 10,000 aircraft operators with aircraft affected by TSA's recent rulemaking proposal. This proposal represents a significant regulatory change in the conduct of private aircraft operations. We believe that the 60-day comment period is insufficient in order to provide TSA with answers to the substantial number of questions posed in the proposal and to provide sufficient time for community education and feedback. We respectfully request that the Transportation Security Administration (TSA) extend the comment period by 60 days. Additionally, we believe that the significant nature of this measure warrants public outreach directly by TSA in the form of public meetings to allow the members of the General Aviation (GA) community impacted by this NPRM to provide feedback and comment directly to TSA representatives.

This proposed rule for the first time extends TSA's regulatory activities to GA aircraft, operators, and pilots flying under 14 CFR Part 91, meaning personal and business use. These private operations are fundamentally different from those conducted by air carriers and we must carefully examine the introduction of TSA security requirements on these operators. With over 15,000 aircraft, 10,000 operators, and 300 airports impacted, the voluminous regulatory changes proposed in the NPRM, and the introduction of new concepts such as third party auditors and watch list checking firms, it becomes impossible to accurately determine the impact of the NPRM and respond to TSA solicited requests for comment and alternatives in the time-frame provided.

We believe TSA will benefit substantially by a 60-day extension to the comment period and the use of public meetings. The additional time and public outreach will allow industry associations, such as AOPA and NBAA and the GA community to better understand the content of TSA's proposal and to develop more relevant and data-driven comments that are so critical to the regulatory process.

We ask that TSA consider this request for an extension to the comment period and the inclusion of public hearings in a timely manner.

Sincerely,

Phil Boyer  
President  
Aircraft Owners and Pilots Association

Ed Bolen  
President and CEO  
National Business Aviation Association

cc: Docket Management Facility  
TSA Office of General Aviation, TSNM

cc: Docket Management Facility  
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