



September 28, 2005

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh St., SW  
Washington, DC 20590-0001

**RE: Docket No. TSA–2005–21866 Ronald Reagan Washington National Airport: Enhanced Security Procedures for Certain Operations**

The Aircraft Owners and Pilots Association (AOPA), representing more than 406, 000 pilots nationwide, submit the following comments to the Interim Final Rule: Ronald Reagan Washington National Airport (DCA): Enhanced Security Procedures for Certain Operations.

According to estimates prepared by the DCA fixed-based operator, approximately 660 general aviation and charter flights occurred per week prior to September 11, 2001. While this Interim Final Rule is a step in the right direction in that it allows limited access to general aviation aircraft, the restrictions being imposed on general aviation flights into DCA are too complex and expensive for most general aviation pilots to even consider. For the typical AOPA member, this final rule will not provide access to DCA for at least one year and even then will be prohibitive to the point that most will not participate. It is AOPA's position that the TSA should reconsider the definition of "corporate operation" as it applies to those initially granted access to DCA and the timeline for granting access to non-corporate and owner flown aircraft known as Phase 2.

The TSA should utilize the nationwide vetting procedures established for DCA applicants by expanding it to general aviation pilots wanting to gain access to College Park Airport, Potomac Airfield, and Washington Executive/Hyde Field, known as the "DC-3." The pilot vetting process for the two procedures is similar and the inclusion of the DC-3 would increase the current locations (3) authorized to collect the required information.

- *Changes to DCA Procedures*

**Definition of "Corporate Operation" and the Consideration of Non-Corporate Aircraft (Phase 2)**

As stated in the TSA's General Aviation at Reagan National Airport - Frequently Asked Questions (FAQs), a corporate operation is "any operation using a paid flight crew, having an operations manual, and requiring recurring flight-crew training. Aircraft that are owned by a corporation but operated by private persons will not be considered for the initial implementation phase of this program."

The TSA should reconsider the definition of corporate operation to allow for the access of any general aviation aircraft that is willing to undergo the procedures outlined in this rule. The issues of paid flight crews, operations manuals and recurrent training have no bearing in the process when applying for access to DCA and so should not be considered as a qualification to begin the process.

The interim final rule suggests a two-phased approach for restoring general aviation access to DCA. The TSA has indicated that it will consider allowing other general aviation aircraft such as owner-flown and non-corporate aircraft into DCA (Phase 2), but only after this program has been in place for one year and only after the TSA conducts a feasibility study to determine a timeline. The TSA should begin the feasibility study for Phase 2 well before October 2006, and thus allowing wider access to DCA as soon as possible.

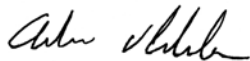
- *DC-3 Procedural Changes*

In a letter to TSA on August 8, 2005, AOPA outlined two operational procedures that should be implemented which would result in significant improvements and allow for easier access to the DC-3 airports. First, modify the current restrictions requiring all applicants to present themselves to the Baltimore/Washington or Dulles Flight Standards District Office (FSDO) and allow applicants to present themselves to any FSDO throughout the country. Second, modify the restriction that specifies DCA as the only location to be fingerprinted and allow for any federal or state facility approved for transmitting fingerprint data. These changes would reduce the time and financial hardships associated with these requirements. Both of these changes could be implemented utilizing the DCA process established by this rule.

- *Summary*

As the TSA moves forward with allowing access to DCA, AOPA strongly recommends that the definition of corporate operator and the timing of Phase 2 be reconsidered to allow for timelier access of all general aviation aircraft. Additionally, the TSA should utilize the national process being put in place for DCA to include those pilots wanting access to the DC-3.

Sincerely,



Andrew V. Cebula  
Sr. Vice President  
Government and Technical Affairs