

November 10, 2008

Transportation Security Administration

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

Gentlemen,

I am the flight department manager for a Fortune 50 company that has been engaged in private aviation for 40 years. We operate a fleet of seven aircraft in both domestic and international service. Our department and company take security very seriously. In that respect, we support your efforts to insure the security of our sovereign airspace.

As I began to review the Large Aircraft Security Program NPRM, I had intended to comment on specific aspects such as cost/benefits, record-keeping burden and operational impact. The LASP document however, seems to be flawed in its underlying assumptions about private aviation in general and corporate aviation in particular.

This segment of the aviation industry, by definition, is not made available to the general public. Passengers and crew will always be known by the operators of these aircraft. In fact, the passengers and crew for any given operator vary little from day to day. Corporate aircraft operators go to great lengths to qualify and vet their flight crewmembers. All of our crews undergo criminal history records checks and are issued security badges by our local airport authority. All of our passengers are company employees who have also undergone extensive background checks prior to employment.

Operators of private aircraft have complete control over whom and what gets on board their aircraft. When out of the country, we retain private security services to watch over our aircraft while they are on the ground. All of our aircraft are equipped with onboard security systems to detect tampering. We are not unique in these actions. Many, if not most, corporate aircraft operators go to the same lengths to provide security for their passengers and employees.

While your assumption may be correct that any aircraft which exceeds 12,500 pounds gross weight could be used for nefarious purposes, the possibility that any privately owned and operated aircraft will be used, without the full knowledge and cooperation of the owner/operator, is so small as to be statistically insignificant.

I would suggest that the better approach is to rely upon current protocols which address the purchase and registration of private aircraft and the training and certification of airmen. Controlling who owns and operates these aircraft privately will serve the purpose of preventing them from being used illegally, except in those instances when the aircraft is stolen. Neither does the proposed LASP address this situation.

In its present form the proposed LASP represents a huge intrusion of federal powers into the business and personal lives of our citizens. Even more to the point, for all the cost, it adds nothing substantive to the security of this nation.

I sincerely hope that your esteemed organization will delay enacting this rule and will continue to work with all segments of the private aviation industry to fashion a security program that more closely fits the realities of our daily operations.

Respectfully,
Glen Knight