



January 8, 2009

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

Re: Docket no. TSA-2008-0021 Large Aircraft Security Program, Other Aircraft Operator Security Program, and Airport Operator Security Program -NPRM

To Whom It May Concern:

The LASP proposal by the Transportation Security Administration is unreasonable and ill advised. Numerous problems exist with cost, implementation and enforcement but it is fundamentally flawed by assuming that there is a significant security risk in the general aviation industry. Damage assessments and costs associated with general aviation aircraft are irrelevant when there is absolutely no evidence to support any real threat or perceived danger. There is no logic in assuming that an aircraft may be a threat if it exceeds some arbitrary weight limit, i.e. 12,500 lb.

3M Aviation has been extremely proactive in the area of security in the years since 9-11. We have consistently gone above and beyond stated requirements in our efforts to provide safe and reliable transportation to our executives. Some examples of our security improvements include:

1. Vast improvements in the physical security of our hangar and office spaces with the construction of new gates and access doors with limited access to even our own employees.
2. A designated security manager with responsibility for overseeing all security concerns for our department.
3. A close working relationship with our corporate security department which incorporates country threat assessments, physical security systems and alarms, and periodic security audits.
4. Criminal history background checks for all of our pilots.
5. ISBAO certification for our flight department.

In addition, 3M has completed all requirements to operate into Washington Reagan National Airport. Only about 1% of general aviation operators have undertaken this rigorous process.

After all we have done in the area of aviation security, the Federal Government is now mandating we comply with a whole new list of measures that appear to have no benefit and will greatly increase our operating costs and workload. Some of our specific concerns include but are not limited to:

1. *Requiring operators to contract with a third party to audit their operation for compliance with their security program and TSA regulations.* The scope and cost of the audit are unclear. Also, the audit would be redundant as 3M already has a biennial audit with a third party to check for compliance with ISBAO requirements which include security concerns.

2. *Restrictions on carriage of TSA prohibited items.* Corporate aviation exists to transport company executives and employees that utilize specialized tools and presentation materials that may be labeled as prohibited by this program. Also, on trips to certain remote areas of the world, we routinely carry aircraft parts and tools along with technicians in case of mechanical difficulties. Inability to fly with these tools and other business materials would significantly impede our operations.

3. *Mandatory improvements and security measures at certain airports designated as "business use airports".* Many of these measures would be extremely expensive and cumbersome. The prohibitive costs of these measures would surely be passed down to FBO's and operators and would greatly affect the cost of operations for our company.

4. *Having third parties act as "watch list service providers" to screen all passengers prior to flight.* Along with the concern of more added cost for this service, there is also concern with the compromising of confidential personal data and identity theft. This is especially true if gender and date of birth are required to be included to facilitate the watch list matching and resolution process.

The above listed security protocols entail significant cost. The costs are impossible to estimate due to the ambiguity of the proposal. A Part 91 flight department like 3M is very familiar with all of its passengers and the need for additional measures such as passenger screening and restrictions on prohibited items are nonexistent. The current economy does not lend itself to spending money on redundant and unnecessary additional security procedures and training.

We would call upon the TSA to establish an Aviation Rulemaking Committee and work closely with groups such as the NBAA and AOPA to establish regulations that will enhance security while facilitating general aviation operations. Let's not regulate for the sake of regulating. We need to determine where threats exist and regulate to mitigate those actual threats.

Sincerely,

Glen Foltz, ATP  
Assistant Chief Pilot  
3M Company