



April 22, 2009

Dear ASN volunteer,

AOPA has been following the controversial issue known as "TSA Security Directive 1542-08F" very closely since it was first announced in December 2008. Like you, we have been extremely frustrated with the information "void" surrounding this change and have been in regular contact with the TSA to try and have the situation remedied. In our most recent meeting, we pressed the TSA to delay implementation of the security directive at Category II, III, and IV airports where general aviation makes up the majority of the activities. Additionally, we urged the TSA to conduct an outreach by Federal Security Directors (FSDs) to provide airports with ideas and alternative measures that will minimize the impact on the general aviation community.

Security Directive 1542-08F was issued by the Airports section of the Transportation Security Administration, Transportation Sector Network Management, Commercial Aviation Division. AOPA immediately objected that no one from the general aviation community was consulted prior to its release. Had we been consulted, we might have been able to mitigate many of the problems that airports, pilots and aircraft owners are experiencing today.

TSA Security Directives (SDs) can be issued without going through the Notice of Proposed Rulemaking (NPRM) process, as we are seeing with this badging requirement. The distribution of the SD is tightly controlled, (because AOPA is not a "regulated party" we have been denied access to the full document) and the TSA's reluctance to provide additional guidance has resulted in a veil of secrecy that has surrounded this SD. This lack of information has led to the rumor mill running rampant and increased the level of frustration for all involved.

To avoid spreading incorrect information among our pilot communities, here are the facts we can share about this SD, which have been verified to the best of our ability:

- Because this SD has been classified "Security Sensitive" it cannot be freely distributed. If you come across the document online, AOPA is advising members that they should not open, download or distribute it because it could lead to a criminal investigation.
- The TSA does **not** consider ASN volunteers "need to know" individuals per 49 CFR 1542.303(f)(1-2).
- The SD requirements only apply to airports with commercial airline service.
- Pilots will not need a badge issued by every airport they visit.
- Escort procedures for transient pilots are in place, and have been for quite some time. This SD should not change those existing escort procedures according to the airport's security plan.
- While AOPA will continue to seek alternatives and solutions, the June 1, 2009 compliance date remains in effect and we encourage you to contact your airport to take the necessary steps to ensure you will have access.
- It should not hinder your trip into Oshkosh for AirVenture or any other airport with commercial service that you visit.
- The TSA has indicated that they will soon release a new version of the SD, which will be known as 1542-08G. SD-08G will provide some clarifications for the airport administration, but will not include any increase or decrease in scope requirements.

AOPA and other industry organizations are dealing with this SD on numerous fronts, and we understand and value the importance of making sure your Congressional representatives fully understand how this

SD will impact general aviation. We encourage you and your fellow pilots to contact your local representatives and explain how Security Directive 1542-08F will affect you and your airport. Because of the recent initiatives by the TSA, there are some members of Congress that combine this issue with the Large Aircraft Security Program (LASP). In your contact, please mention 1542-08F specifically so that members of Congress understand this is a separate (and equally as important) issue.

Areas of concern that you may want to bring to their attention include:

- All general aviation pilots are covered by similar security measures as commercial pilots including vetting. The requirement for an additional check as spelled out in the SD seems redundant.
- The TSA has laid out, in regulation, definitions of sensitive portions of the airport including Security Identification Display Area (SIDA), Secured Area, and Air Operations Area (AOA). Each area has differing requirements based on its sensitivity. This SD does not seem to take this into account.
- Previously, the TSA and FAA have recognized the principle of time and distance when applying security measures at remote sections of the airport. This SD appears to ignore this option.
- This SD also appears to ignore the differences that exist between airports, which may impose unnecessary requirements on many of the smaller airports in the country.
- Ask your elected official to urge the TSA to suspend implementation of the badging requirement at Category II, III, and IV airports until workable alternatives can be developed.

AOPA staff members have been involved in many meetings with the TSA, DHS and other associations who are just as concerned as we are. We also continue to work on Capitol Hill to educate Congress and their staff about SD 1542-8F. AOPA is working with the TSA to develop alternative proposals and procedures that will minimize the impact on general aviation, and will be looking into long-term solutions as well (similar to those that AOPA members have suggested/discussed). Rest assured, we are doing all we can to bring our concerns and impact to the highest level of the TSA and DHS. If you have any questions, do not hesitate to contact the Pilot Information Center at 1-800-USA-AOPA or via email at pilotassist@aopa.org. Our Aviation Technical Specialists are fully briefed on this issue and would be happy to assist you.

Sincerely,



Craig Spence
Vice President, Regulatory Affairs
Aircraft Owners and Pilots Association

Stories AOPA has published on this issue:

http://www.aopa.org/whatsnew/region/2009/090416montana.html?WT.mc_id=090417epilot&WT.mc_sect=gan

<http://www.aopa.org/advocacy/articles/2009/090317tsaliaison.html>

<http://www.aopa.org/advocacy/articles/2009/090312tsaliaison.html>

<http://www.aopa.org/advocacy/articles/2009/090224badges.html>

<http://www.aopa.org/advocacy/articles/2009/090212tsa.html>

<http://www.aopa.org/advocacy/articles/2008/081218security.html>

Links to writing your elected officials:

Representative: <https://writerep.house.gov/writerep/welcome.shtml>

Senator: http://www.senate.gov/general/contact_information/senators_cfm.cfm