

**Subject:** TSA SD Badging Requirements  
**From:** Rob Duncan <duncan@airbase1.com>  
**Date:** Wed, 08 Apr 2009 19:37:44 GMT  
**To:** Collin Fay <crfay@coloradoflightcenter.com>

To all,

I just got off phone with Craig Spence AOPA Vice President, Regulatory Affairs who thoughtfully took time to explain personally how they have been working on Security Directive (SD) 1542-08F as issued by the Airports section of the Transportation Security Administration, Transportation Sector Network Management, Commercial Aviation Division. AOPA learned of about this SD in December. Since TSA did not deem AOPA as a regulated party by TSA in regard to the SD, they were not initially consulted, nor are they able to get a true copy of the ever-changing document. The TSA may issue a SD without a comment period, as witnessed by the August '06 one against carry-on liquids for airline passengers.

During a recent security audit at an airline-serviced airport, the TSA "discovered" there are no "Security Threat Assessment" (STA) vetting procedures in place for business tenants at many airports. Any person who works for an aircraft service organization at the airport may gain access to any Air Operations Area (AOA). The difference between the airport business tenants and those based pilots who have hangars or tied down aircraft was vague in TSA's initial view. So the initial directive required that both entities be badged after passing a STA vetting process. The SD did not require badging of transient pilots as the security of those operations are generally covered in existing guidelines as set forth by individual airports - e.g. a ramp agent or other official has the tie down or self-fueling areas under visual control, or there is sufficient "time and distance" to allow airport personnel to interdict anyone seen with questionable actions.

In February, the AOPA pointed out to TSA that all FAA licensed pilots, mechanics, etc. are already being electronically vetted with the DHS watch list, background checks, citizenship verification, etc. Licenses for pilots who fail these ongoing checks are being revoked. Tamper-proof licenses have been re-issued to all pilots that pass these checks and these will become mandatory. Therefore requiring an additional check of the exact same information solely for the purpose of issuing a separate airport specific ID badge is a needless waste of time and money.

The TSA has made many hollow promises in response to AOPA's requests that were made in February. These actions have caused AOPA to pause in alerting its total membership until they know the exact nature of the still-changing SD. However this will soon change as AOPA with other groups ask for you to now contact your senators and congressmen with your views on this wasteful and redundant SD - at least as it pertains to pilots.

In my personal view, you should immediately petition your local airport management to withhold making any hasty decisions pertaining to the badging of tenant (resident) pilots, and for any draconian measures about requiring escorts for transients, etc. Although the deadline for compliance with the mysteriously "unavailable for print" SD is June 1st, let us hope cooler minds prevail and these measures will not be required by the revised SD.

Write. Donate more so that AOPA has more resources to work on the behalf of General Aviation. Ultimately only you can protect your own freedom of flight.

- Rob Duncan, CFI/ASMEI-IA, A&P

ASN Volunteer, 99V

-----Original Message-----

**From:** Spence, Craig  
**Sent:** Wednesday, April 08, 2009 6:36 AM  
**To:** Rob Duncan

AOPA has been following this issue very closely since it first was announced in December, 2008. Like you we have been extremely frustrated with the information "void" surrounding this change and have been in constant contact with TSA to try and have the situation remedied. The controversial change, known as "Security Directive 1542-08F" was issued by the Airports section of the Transportation Security Administration, Transportation

Sector Network Management, Commercial Aviation Division. They initially released the change to airports that are currently regulated by TSA and have commercial service. AOPA asked to be brought into the discussion, but because we are not a regulated party they have been very reluctant to share any information that we could pass on to our members.

The issue in Montrose, CO is the most visible because of a series of on-line postings that detailed a meeting between TSA, Airport Management, and the tenants at the airfield. The timing of this meeting, combined with the heightened awareness of TSA resulting from the Large Aircraft Security Program, and TSA setting up screening at several FBO's in response to their Operation Playbook created the perfect "TSA Security Tsunami" that just fed fuel to the fire.

The part of the security directive that impacts GA is that any pilot with an aircraft at an airport served by Air Carriers and thus regulated by TSA will be required to obtain an airport ID in order to get onto the field. Out of the 430 airports regulated by TSA, approximately 280 will be affected. The other 150 currently require ID's and will not be affected. Transients will continue to be treated as they have in the past and covered by escort programs established by the FBO's

AOPA is working with TSA to develop alternative proposals and procedures that will minimize the impact on GA, and will be looking into long-term solutions as well. Rest assured, we are doing all we can to bring our concerns and impact to the highest level of the Department of Homeland Security and the TSA. I've included links to several stories that we have done on this issue for your reference.

<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/2009/090224badges.html>

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

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

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

This was sent by the Colorado Pilot Association website "email members by airport" fundion