February 5, 2009

Gale Rossides
Acting Administrator
Transportation Security Administration
601 South 12th Street (TSA-1)
Arlington, VA 22202-4220

Dear Madam Administrator:

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

The Aircraft Owners and Pilots Association (AOPA), the National Business Aviation Association (NBAA), the General Aviation Manufacturers Association (GAMA), and the Experimental Aircraft Association (EAA) represent the operators, owners and manufacturers of general aviation aircraft that would be significantly affected by the Transportation Security Administration’s (TSA) pending rulemaking proposal regarding the Large Aircraft Security Program (LASP). The general aviation industry has been very aggressive promoting security initiatives since the terrorist attacks of 9-11. When it comes to security, the general aviation community has led, not followed. We take a back seat to no one in our commitment to security, and our actions to date have demonstrated that fact. However, the proposals put forth in the LASP Notice of Proposed Rulemaking (NPRM) will do little to improve general aviation security and will have disastrous consequences on the industry.

Given the proposals substantial lack of data regarding the effect of this program on general aviation, and TSA’s numerous requests for critical information from the public, we are formally requesting that TSA begin the steps necessary to establish a rulemaking committee. Creation of a dedicated workgroup would allow industry and the TSA to work together on requirements that would simultaneously enhance general aviation security and facilitate general aviation operations. A rulemaking committee would provide a secure forum for stakeholder information sharing and the development of sensible and implementable measures.

We look forward to working with TSA on regulations that will simultaneously enhance general aviation security and facilitate general aviation operations.

Sincerely,

Craig Fuller
President and CEO
Aircraft Owners and Pilots Association

Ed Bolen
President and CEO
National Business Aviation Association

Pete Bunce
President and CEO
General Aviation Manufacturers Association

Tom Poberenzy
President and CEO
Experimental Aircraft Association
cc: Docket Management Facility
TSA Office of General Aviation, TSNM

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