



NATIONAL HEADQUARTERS
CIVIL AIR PATROL
UNITED STATES AIR FORCE AUXILIARY
MAXWELL AIR FORCE BASE, ALABAMA 36112-6332

12 March 2009

MEMORANDUM FOR REGION AND WING COMMANDERS

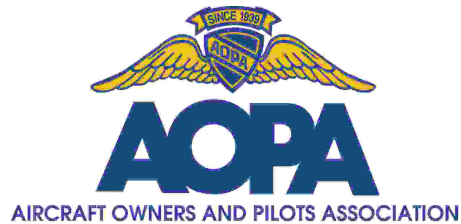
SUBJECT: Transportation Security Administration (TSA) Security Directive 08F

1. On 10 December 2008, TSA issued a Security Directive (SD) to all airports with commercial airline service. The SD requires Security Threat Assessments to be conducted for all general aviation owners and operators. Additionally, the SD requires all persons with regular and frequent access to the Air Operations Area to meet the same requirements (i.e. special photo IDs) as persons with access to the Security Identification Display Areas. In most cases the aircrew members would be expected to bear the costs for the additional screening and ID. This would have a far reaching affect on CAP members and our ability to perform Air Force assigned missions.
2. AOPA is a long time partner of CAP and they have been working hard to get TSA to explore less costly and burdensome alternatives that will address TSA's immediate security concerns. At AOPA's request, CAP provided a number of reasons why CAP should be exempted from the requirement. As a result of AOPA's efforts so far, TSA has extended the compliance date to 1 June 2009. In addition to working with AOPA, CAP is also seeking Air Force support to get this important issue resolved. We are hopeful TSA will extend the date even further or they will come up with a better alternative that will meet CAP and general aviation's needs.
3. Please use the attached information to express your support for AOPA's recommended action when you and your staff speak with airport leaders and your Congressmen. We will keep you informed as new developments occur. You can also get the latest updates directly from AOPA's website at <http://www.aopa.org/>.


JOHN A. SALVADOR
Director of Missions

Attachment:
AOPA 25 Feb 09 Information Memo

cc:
HQ CAP/CC/CV/CS/SE/EX/EXM/ED/PM/GC/DO/LG/XP/GVR/NOC
Senior Advisor for Operations (Col Skiba)
Senior Advisor for Administration (Col Guimond)
HQ CAP-USAF/CC/CV/XO
1st AF/CAP LNO
AOPA (Craig Spence and Rob Hackman)



INFORMATION MEMO

DATE: February 25, 2009
FROM: Craig Spence
SUBJECT: TSA Security Directive SD-8F

On December 10, 2008, TSA issued Security Directive (SD) 1542-04-08F (SD-08F) to commercial service airports. The SD requires Security Threat Assessments (STA) to be conducted on an expanded airport population including all general aviation owners and operators. Additionally, the SD requires all persons with regular and frequent access to the Air Operations Area to meet the same requirements as persons with access to the SIDA. While this is only one portion of the SD it has had the largest economical and operational impact on airports, aircraft owners and operators.

Airports, not pilots are the regulated party and the TSA had been reluctant to discuss the SD at any detail with stakeholders. A breakthrough occurred when AOPA pointed out that a pilot in this instance is similar to a passenger -- affected by security changes and open lines of communication are essential. TSA agreed and will be calling industry groups together and will seek input on developing user guidance and exploring alternative procedures. TSA has extended the compliance date 60 days to 1 June, 2009

AOPA's concerns

- The SD was issued without consulting key industry stakeholders.
- Despite repeated attempts to engage TSA all requests for information were refused
- Changes fail to take into account the inherent difference between these areas and appear to negate the time tested concept of time and distance.
- New requirements do not reflect real world scenarios at many Category II, III, IV airports, where general aviation represents a majority of the activity and revenue
- Conducting Security Threat Assessments duplicates the continuous TSA vetting that is conducted on all pilots and represents an unnecessary additional cost.

Recommended Action

AOPA urges TSA to work with industry and operator stakeholders to explore less costly and burdensome alternatives that will address TSA's immediate security concerns. Substantial changes to existing regulations should be pursued through the normal regulatory process rather than through the security directive process.