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601 Madison Street ■ Suite 400 ■ Alexandria, VA 22314 ■ 703/824/0500 ■ Fax 703/820/1395 ■ www.airportnet.org

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June 3, 2002

The Honorable John Magaw
Under Secretary of Transportation For Security
Transportation Security Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

VIA FACSIMILE: 202-366-9955

Dear Mr. Under Secretary:

Attached is a list of initial recommendations developed by a task force on general aviation airport security adopted by the Board of Directors of the American Association of Airport Executives (AAAE). These recommendations, which represent a "work in progress," were developed by a broad spectrum of general aviation airport industry representatives over the past several months. The task force consisted of airport officials from numerous general aviation airports of varying sizes, as well as representatives of the National Association of State Aviation Officials and the National Business Aviation Association.

AAAE members want to assist in the development of programs that enhance aviation security at general aviation airports while continuing the viability of this important segment of aviation. In light of the recent FBI alerts on aviation security, we believe these recommendations can serve as a useful tool in determining how to effectively address general aviation airport security challenges.

Please contact me or the AAAE staff if you have any questions about the recommendations outlined in the attached document.

Sincerely,

Charles Barclay

AAAE GENERAL AVIATION AIRPORT SECURITY TASK FORCE RECOMMENDATIONS

INTRODUCTION

As Transportation Secretary Norman Mineta's "Report to Congress on Improving General Aviation Security" (dated December 19, 2001) makes clear, general aviation (GA) airports are a critical and economically significant part of the nation's aviation infrastructure. Because each of the approximately 4,900 public-use GA airports serve as an entry point into the nation's airspace system, it is important, in the aftermath of the events of September 11, that reasonable and prudent steps be taken to ensure that GA airports and aircraft are as secure as possible.

Secretary Mineta's report states there are over "200,000 general aviation aircraft operating from over 18,000 airports, with an estimated 145 million passengers annually." The report goes on to point out that, "more than 5,400 communities in the United States rely exclusively on general aviation for their air transportation needs. General aviation's role in the economic life of the nation is significant."

It must be recognized that security issues at GA airports, while very important, differ from those at commercial service airports, and that the financial resources available to GA airports to implement enhanced security measures are extremely limited. It is of critical importance that any GA airport security regulations adopted by the federal government take those important factors into consideration.

To address security concerns at GA airports, the American Association of Airport Executives (AAAE) created a task force to make recommendations on the future of GA airport security. Task force members included officials from numerous GA airports, as well as representatives from the National Association of State Aviation Officials.

DEFINING THE THREAT

The task force believes, in the aftermath of the September 11, attacks, that the main terrorist threat against GA and GA airports is the possible theft or hijacking of aircraft for use as potential terrorist weapons. Thus, the most likely target is the aircraft itself, rather than GA airport facilities and infrastructure.

The September 11 terrorist attacks demonstrated how aircraft could be used as bombs or missiles against targets on the ground. While the aircraft used in the World Trade Center and Pentagon attacks were large airliners, a potential exists that GA aircraft, particularly (though not exclusively) larger corporate jet aircraft, could be used for similar or other terrorist purposes.

It is theoretically possible that terrorists could attempt an attack on the infrastructure of a GA airport, with the intent of causing physical damage to facilities and/or killing or injuring airport users. In the opinion of the task force, however, the likelihood of such an attack being launched solely for that purpose is considered remote, with the possible exception of busy GA airports near major metropolitan areas. Such an attack against airport infrastructure or users is far more likely at commercial service airports, where large numbers of passengers and public-use facilities provide a much more inviting target to potential terrorists.

RECOMMENDATIONS

Historically, GA airports have not been high-security facilities, and the federal government has not regulated GA airport security as it has done at commercial service airports. Under current rules, security-related expenses at GA airports are not eligible for funding under the Airport Improvement Program (AIP).

The task force wants to emphasize strongly that the ability of the large majority of GA airports, many of which are not self-sustaining, to implement enhanced security measures will be contingent upon the provision of extensive financial assistance from the federal government. Any new regulations should not be promulgated without an appropriate new funding source(s) from the federal government to finance new security requirements at GA airports. Simply diverting funds from AIP or other existing federal programs would only serve to reduce funding for necessary airport safety and capacity projects. A separate section later in this report addresses the unique financial needs and challenges faced by GA airports in funding security-related improvements.

The task force proposes that the following recommendations be focused on public-use GA airports in the United States. Presently, there are approximately 4,900 public-use GA airports in the U.S. that are either publicly or privately owned.

RECOMMENDATION 1: For security purposes, four different categories for a federal security program at general aviation airports should be established (1 through 4, with 1 being the highest). The criteria for the four categories would be based on the airport's location, runway length and number of based aircraft.

Just as all commercial service airports are not alike in their security needs and threat exposure, the same is true with GA airports. GA facilities differ greatly from one another both in location and sophistication, as well as in the capability to handle different types of aircraft. In determining what type and level of federal security requirements would be appropriate for individual GA facilities, a classification system that takes into account the location of the facility (in particular, its proximity to urban areas or security-sensitive facilities) and the number and type of aircraft that can utilize the airport is necessary.

Based on the above criteria, the task force recommends the following categories:

Category 1: A public-use GA airport located in close proximity to major metropolitan areas or security-sensitive facilities, such as military bases and nuclear plants, with (a) runway length of 4,001 feet or greater, and/or (b) 200 or more based aircraft.

Category 2: A public-use GA airport located in close proximity to major metropolitan areas or security-sensitive facilities, such as military bases and nuclear plants, with a runway length of 4,000 feet or less, and up to 200 based aircraft.

Category 3: A public-use GA airport not located in close proximity to major metropolitan areas or security-sensitive facilities, such as military bases and nuclear plants, with (a) runway length of 4,001 feet or greater, and/or (b) more than 50 based aircraft.

Category 4: A public-use GA airport not located in close proximity to major metropolitan areas or security-sensitive facilities, such as military bases and nuclear plants, with a runway length of less than 4,000 feet, with 50 or fewer based aircraft.

NOTE: Further research is needed to determine the exact definition of "close proximity to major metropolitan areas."

RECOMMENDATION 2: All four categories of general aviation airports should prepare a comprehensive airport security plan that is commensurate to the size of each facility.

To fully delineate the response needed for specific security threats to the nation's airports, it is important for individual airports to develop a security plan for responding to those threats. The scope and depth of each plan should be appropriate to the size and operating complexity of each individual airport. The development of an airport security plan would provide the airport and its tenants with a baseline for the security posture of the airport. Category 3 and 4 airports that are operated by a single governmental entity could be combined into a single plan. **These security plans should be developed by the local airport operator and coordinated with the Transportation Security Administration (TSA).**

The security plan should include the following and be based on the size and operating complexity of each individual airport:

- ✍ Procedures designed to restrict airside access to authorized individuals, as well as a security "watch and challenge" program.
- ✍ Installation of adequate outdoor area lighting to help improve the security of (a) aircraft parking and hangar areas; (b) fuel storage areas, and, (c) access points to the aircraft operations area (AOA).
- ✍ Installation of security fencing and/or electronic monitoring to help prevent unauthorized access to the AOA, fuel facilities and other sensitive areas.
- ✍ Implementation of vehicle access control procedures and gate control systems that minimize the potential for unauthorized access to the AOA, fuel facilities and other sensitive areas.
- ✍ Installation of signage around the AOA, fuel facilities and other sensitive areas to deter unauthorized entry.
- ✍ Procedures for the airport operator to increase security and/or local law enforcement presence as necessary to respond to increased threat levels.

Background Information on These Recommendations: Adequate lighting is one of the simplest yet most effective deterrents to criminal activity. GA airports, like many similar industrial facilities, can increase security around airport property and buildings by installing bright area lighting in critical areas of the airport. The three areas that should be minimally included as part of a GA airport's security lighting plan are (a) aircraft parking and hangar areas; (b) fuel storage areas, and (c) access points to the AOA. These areas are the most critical to visually monitor unauthorized access and should be lit adequately to allow for appropriate nighttime surveillance and to deter criminal activity. Development of appropriate security lighting guidelines should be based on existing time-tested industrial security lighting parameters and consider the unique nature of aviation operations, local weather conditions, nighttime flight requirements and runway lighting.

Fencing appropriate for regulating access to sensitive areas of GA airports is also a basic method of enhancing security and implementing other GA security recommendations. While the type and characteristics of fencing

will vary widely based on the type of area to which it is intended to restrict access, basic access control, surveillance and perimeter delineation are all predicated on the basic need to fence off certain inherently sensitive areas of GA airports. The height, perimeter delineation and other fencing characteristics should all be based on standard aviation guidelines and, where such guidelines are not available, the industry should work cooperatively with the Transportation Security Administration (TSA) to establish various models that allow appropriate control of access while minimizing financial impacts. Additionally, the need and scope of fencing should be relative to each category of airport. This recommendation is a critical component in facilitating access control systems and innovative uses of electronic surveillance. The discretionary use of electronic surveillance equipment installed at GA airports could provide a cost-effective deterrent to unauthorized access to the airport and allow early notification to authorities in the case of a security breach.

GA airports should ensure that vehicular access to the airport is granted only to authorized personnel or tenants. These systems should be of sufficient standard to prevent the piggybacking of vehicles. A vehicle access control system, effectively combined with an electronic surveillance system, fencing or regular security patrols, would help prevent unauthorized access to the airport and allow notification of security breaches to law enforcement authorities. An additional safety benefit also would be introduced as the improved access control system could prevent unauthorized vehicles from causing aircraft/vehicle runway incursions.

Signage by itself cannot prevent terrorist activity or other crimes. It can, however, be a useful component of a total airport security program by having a deterrent effect and helping a facility present a more uniformly secure appearance. The task force recommends that the TSA establish a security signage standard for all GA airports. This would include physical standards for signage (i.e., specific wording, size, type of lettering, etc.), as well as criteria for how and where such signage should be installed.

RECOMMENDATION 3: At Category 1 and 2 airports, criminal record background checks should be required of all airport, fixed based operator (FBO) and airport tenant employees with unescorted access to the aircraft operating area (AOA). Criteria similar to that used in TSAR 1542 (formerly FAR part 107) should be developed to determine what offenses would disqualify individuals from being granted such access.

One of the most compelling and readily achieved methods of enhancing security in GA operations is by screening the individuals who most frequently work in GA operations against established federal criminal and terrorist databases. Based on the current regulations governing TSAR 1542 airports and related commercial service tenants, individuals who work for GA airports, FBOs and other tenant organizations and who have unescorted access to the AOA should be required to undergo a criminal history record check at Category 1 and 2 airports. These record checks are an important security component in ensuring that those who have frequent, unescorted access to the operations areas of those airports do not have criminal pasts. The record checks, similar to those conducted at scheduled commercial service airports, would be run against FBI databases that will determine whether employees have been convicted of a felony. Those whose records indicate convictions of one or more of the over 30 felonies listed by TSAR 1542 regulations should be denied unrestricted access to the AOA. Furthermore, by using the existing FBI criminal history background check system, screening of GA personnel will benefit from the continued improvements in the current system as more databases and resources are brought to bear in combating criminal and terrorist activity in aviation.

RECOMMENDATION 4: A system should be devised by the TSA to communicate information about specific and general security threats from appropriate authorities to managers of all four categories of GA airports.

All GA airports can improve their overall security posture by developing a security plan, making physical improvements and implementing other steps, such as those recommended in this report. However, when the

TSA and intelligence or law enforcement agencies are aware of a general or specific threat that could affect GA airports, that information should be shared directly with airport management at those facilities. Having access to such information would enable airport managers, in conjunction with other law enforcement resources, to take additional and specific security steps applicable to the particular threat. To help implement such a program, GA airport operators should designate a single point of contact with the TSA and intelligence and law enforcement agencies.

The task force recognizes the national security issues associated with such a procedure and believes that the best way to address this concern would be to require that airport managers given access to such information obtain and maintain an appropriate federal security clearance. A similar successful program is already in effect for key management personnel at some commercial service airports.

RECOMMENDATION 5: The TSA should consider the development and implementation a “smart card” type of pilot license.

The federal government needs to update the current pilot license. The paper card now in use can be easily counterfeited and provides no useful data that could be used to enhance aviation security. An identification card utilizing “smart” technology features should include counterfeit resistant photographs and embedded biometric technologies that would enhance aviation security. This would be particularly advantageous to the airport operator during times of heightened security by providing a more reliable pilot identification system. The development of this type of identification also would facilitate the research and application of new technologies limiting access to GA airports to those pilots with a need for such access.

RECOMMENDATION 6: The TSA should issue regulations that require all general aviation aircraft be secured in a locked hangar or by some type of physical locking or disabling device when unattended. Responsibility for compliance with this rule would rest with individual aircraft owners and/or operators.

Due to their lower level of sophistication and relative lack of physical security, GA aircraft can be particularly vulnerable to theft. Given the events of September 11, this is a valid security concern. The reality, however, is that no airport security program, regardless of how comprehensive, can keep every GA aircraft under physical observation at all times.

The task force believes that the best solution to this problem is to require all owners and operators of GA aircraft to secure their aircraft in a locked hangar or with some type of TSA-approved anti-theft equipment. For smaller aircraft, a number of these items are currently on the market, including throttle locks, propeller locks and ignition-disabling devices.

The task force feels strongly that the responsibility for compliance with this rule should rest with individual pilots and aircraft owners, since they are in the best position to ensure that their aircraft are secure. With GA airports often having up to hundreds of based aircraft stored in multiple indoor and outdoor locations, it would be extraordinarily difficult and burdensome for airport managers to constantly monitor or enforce the physical security of every aircraft on their airports.

RECOMMENDATION 7: The federal government should establish a nationwide technology research program to determine the benefits/applicability of new and emerging technologies to improve security at all categories of GA airports. This program should be a "new" appropriation and not be funded from current federal programs.

New technologies need to be tested in an operational setting to measure their viability in day-to-day use. By establishing a nationwide technology research program to measure the benefits/applicability of emerging

security technologies, the federal government can encourage enhanced security at GA airports while providing much needed funding to further aviation security research. Such programs would not only benefit GA security, but could provide positive benefits to commercial aviation security as well. The management of a nationwide GA security research program could reside within existing programs at the Federal Aviation Administration (FAA) or the TSA.

RECOMMENDATION 8: The federal government should work with local airport operators, where appropriate, on the addition of FAA contract towers at non-towered airports as an added measure of surveillance/security at GA airports.

Air traffic control towers provide an added measure of surveillance/security at airports by allowing surveillance over local airspace, aircraft ramps and runways. This constant attention can allow controllers to immediately identify a major breach in standard aircraft operating procedures and make appropriate notifications. An example of this is the recent incident in Tampa/St. Petersburg, Florida, on January 5, 2002, in which the controllers alerted local authorities when a student pilot took off without clearance.

The primary responsibility of air traffic controllers is air traffic safety. However, in the case of major security breaches, controllers also can direct other aircraft operations clear of the affected area, thus preventing an increase in potential damage. Additionally, all controllers continually train on, practice and apply anti-hijack procedures. Accordingly, the task force recommends that Congress pass legislation to make contract tower construction/equipment eligible for AIP funding at airports that qualify for the FAA Contract Tower Program. The task force recognizes that it is not practical to build towers at all GA airports; however, a number of non-towered, busy GA facilities, some of which are located near major metropolitan areas, have expressed interest in building a tower and could qualify for inclusion in the FAA Contract Tower Program, based on the level and mix of air traffic, if they had access to AIP funds to construct a tower.

FUNDING ISSUES

As policymakers contemplate future security enhancement at GA airports, a key item that must be addressed is how to pay for needed security upgrades. It is important to note that GA airports have extremely limited aeronautical and non-aeronautical financial resources compared to commercial service airports.

The 2001 aviation security bill, for example, authorized more than \$1 billion to help commercial service airports meet security expenses, but largely ignored GA airports outside of a provision that gave facilities affected by the closure of Class B airspace authority to use AIP funds for fiscal year 2002. A separate piece of legislation to provide relief to the GA industry has passed a House subcommittee but has little chance of becoming law, despite the successful inclusion in that legislation at the behest of AAAE/ACI-NA of provisions to ensure that GA airports are eligible for any of the assistance made available under the measure.

Consequently, funding remains a major challenge in addressing many of the security enhancements contemplated by this task force. Given the importance to the nation of improving security at GA airports — each of which is an entry point to the nation's air transportation system — decisionmakers at the local, state and federal levels must consider a host of changes aimed at providing additional resources to GA facilities. In particular, direct federal assistance, changes to AIP and other funding mechanisms merit attention.

This task force does not have the “magic formula” that will ensure long-term funding for GA security enhancements. We have, however, identified a number of possible sources of funding for consideration as state and local governments tackle this issue and as Congress prepares for the next FAA reauthorization bill or subsequent airport security measures:

- ? Direct federal assistance to GA airports without the requirement for local matching funds. Given the national security implications of airport security, funding along these lines should come from the general treasury.
- ? Low-interest federal loans. Although obviously a less attractive option, low-interest federal or state loans may help local communities obtain necessary funding for GA airport security improvements.
- ? Increasing the existing general aviation entitlement under AIP from the current maximum of \$150,000 per facility.
- ? Creation of a new discretionary “set-aside” for GA security within AIP accompanied by an increase in total appropriations to cover these new resources.
- ? Dedication of a portion of the Small Airport Fund within AIP to GA security.
- ? Establishment of a GA security fee to help generate funds on the airport. This fee could mirror the existing passenger facility charge.
- ? Limiting the scope of grant assurances for privately owned public-use GA airports that accept AIP funding solely for the purpose of security upgrade projects.
- ? Retroactive reimbursement to GA airports for eligible security improvements undertaken after 9/11/01 while awaiting federal security directives and guidelines.

While many of the items identified above are likely to be controversial among certain constituencies, including some members of this task force, they nonetheless merit some consideration. Without a dedicated source of federal funding, it will be virtually impossible for the vast majority of GA airports to finance new security initiatives. It is the hope of the task force that state and local governments and Congress will consider these changes and develop other approaches that could provide long-term funding for general aviation security improvements.

June 3, 2002