National Association of State Aviation Officials

General Aviation Security

December 2002

Prepared by:

National Association of State Aviation Officials
8401 Colesville Road ï Suite 505
Silver Spring, Maryland 20910-3349
(301) 588-0587
Fax: (301) 585-1803
www.nasao.org

Introduction. Founded in 1931, the National Association of State Aviation Officials (NASAO) is one of the most senior aviation organizations in the United States, predating even the Federal Aviation Administrationís predecessor, the Civil Aeronautics Authority. NASAO was initially established by the states to ensure uniformity of airport safety measures, to standardize aviation regulations and develop a truly national air transportation system responsive to local, state, and regional needs. NASAO has been unique among aviation advocates, representing the men and women in state government aviation agencies who serve the public interest in all 50 states plus Guam and Puerto Rico. NASAO continues to maintain its strong relationship with all the leading aviation groups and similar associations, and it is the only organization of its type to have an official Memorandum of Understanding with the Federal Aviation Administration.

The responsibilities of the state aviation agencies are growing. The highly skilled professionals of NASAO are full partners with the federal government in the development and maintenance of the safest and most efficient aviation system in the world.

Purpose of this Report. The tragic events of September 11, 2001 have irrevocably changed the standards of national security in the United States of America and civilized nations around the world. Unthinkable acts of terrorism involving civil aviation necessitates a complete review of current aviation security standards and warrants consideration for creating national security standards for general aviation (GA) airports. NASAO is an industry leader in thoughtful debate of relevant aviation issues and is uniquely qualified to advise federal authorities on matters of airport security.

- This report summarizes NASAOís position on general aviation security and is intended to offer advice, recommendations and guidance to federal authorities for developing a national policy and appropriate standards of airport security for public-use general aviation airports located in the United States of America, including the Commonwealth of Puerto Rico and the Territory of Guam.

Scope of this Report. NASAO recognizes that Section 132(b) of the *Aviation and Transportation Security Act* (hereafter referred to as *the Act)* required the Under Secretary of Transportation for Transportation Security to submit a report to Congress on airspace and other security measures that can be deployed to improve general aviation security.

- The scope of this NASAO Report shall be limited to public-use general aviation airports as referenced in the Secretaryís report to Congress, titled *Improving General Aviation Security*, pursuant to Section 132(b) of *the Act*.

Assessing Vulnerability. As stated in the Transportation Secretaryís Report to Congress, there are two principal security objectives for general aviation: (a) *protecting air passengers and aircraft from attack*, and (b) *preventing aircraft from being used as weapons directed at sensitive targets on the ground*. The use of aircraft as weapons by terrorist operatives would likely result in the destruction of civilian targets, and therefore, preventing this threat should be the primary focus of concern. In fact, the Secretaryís Report to Congress identifies two types of threats: (1) *the possibility of the aircraft being turned into a weapon, either by the authorized pilot or by someone who takes over the aircraft*; and, (2) *deliberate sabotage, including the potential that a bomb or explosive device might be placed on an aircraft*.

Meaningful and effective security measures should be designed to mitigate the principal threats to general aviation. The tragic events of September 11 and subsequent alerts of additional terrorist activity issued by government intelligence authorities have influenced many public officials including local airport managers and state aviation agencies to adopt and implement their own airport security standards in lieu of federal security requirements. Continuation of this trend in the absence of national security standards could result in an inefficient patchwork of regulation with potentially damaging consequences for our national air transportation system.

- NASAO recommends that federal authorities adopt a national policy towards protecting general aviation facilities including, but not limited to, the protection of airports, aircraft, pilots and flight crews. Such a policy should provide a seamless regulatory framework for implementing meaningful and effective security measures at general aviation airports across the country while maintaining a safe and efficient national air transportation system.

Overview of General Aviation Security. By definition the term ìgeneral aviationî includes a broad range of aircraft and aviation activity. Not surprisingly, GA airports vary greatly in size, function and operational characteristics. Until this time, federal authorities have not imposed any requirement to implement security measures at GA airports. Nevertheless, many GA airport managers commonly enforce security measures typically found at commercial service airports. Examples include fencing and access control devices for vehicle and pedestrian gates, daily airfield inspections, landside and airfield signage, and public awareness programs for educating the aviation community as well as the general public on the safe and efficient use of the facility.

However, many general aviation airports, especially those located in rural or remote areas, have very few, if any, security measures in place. In fact, some of these same airports are unattended day and night. Given our nationís heightened sense of awareness, terrorists would likely prefer to base an attack close to their intended target so as to minimize the chance of interception by military aircraft. Therefore, such inactive and remote facilities pose less of an immediate security risk than other more active airports located closer to obvious targets such as population centers. Consequently, security measures would vary for different types of airports.

- NASAO recommends that federal authorities implement a process of categorizing airports and that minimum security standards be adopted for each category. Airport categories could include, but not necessarily be limited to, the following criteria: runway length, proximity to population centers and to other obvious targets such as dams and nuclear power plants, and the type of aircraft that regularly operates at an airport.

At this time, it is difficult to develop a national standard for specific airport categories. Such an undertaking requires much thought and should be accomplished with input from the leading interest groups representing general aviation including NASAO. In that effort, NASAO is ready to participate and wishes to offer advice in this regard.

Proposed Airport Security Measures. There is no panacea for preventing future terrorist attacks involving aircraft or airports. While the FAAís action of shutting down the national airspace system last year on September 11 was certainly extreme, it effectuated the desired result. However to quote a statement in the Secretaryís Report to Congress, ì*shy of such an extreme measure, a range of actions may be deployed in response to specific levels of threat*î. So, reasonable security standards should be developed for different categories of airports to

adequately address real vulnerabilities and to mitigate varying threat levels. State aviation agencies should be allowed to impose additional security requirements as long as they do not conflict with federal government standards.

- NASAO recommends that federal authorities make the necessary changes to existing rules and regulations, where appropriate, and secure legal authority to require the following new security standards for all public-use general aviation airports regardless of ownership status:

  Security Measures Required For All Airport Categories

  a. **Securing Unattended Aircraft.** In an effort to prevent the theft and/or unauthorized use of an aircraft, each aircraft owner or operator should be required to take steps to secure their aircraft at all times when it is unattended. Possible options to consider include:

     i) installing anti-theft devices on and/or within their aircraft when not in use.
     ii) installing devices to lock aircraft flight control surfaces when not in use.
     iii) removing the keys to their aircraft, if applicable, and lock all doors when not in use.
     iv) installing other lockable devices to secure their aircraft to the ground.
     v) locking doors on aircraft storage hangars at all times when not in use.

     Lockable devices for aircraft should be compatible to the specific type of aircraft.

  b. **Reporting Unusual or Suspicious Activity.** Similar to previous guidance offered by the FAA, a process for reporting unusual or suspicious activity should be standardized. The airport operator and all tenants should post such a notice in highly visible, conspicuous locations. The FAA should consult with appropriate government intelligence agencies to review the current guidance and modify as necessary. Misuse, apparent falsification or forgery of proper identification or credentials should be added to the list of unusual or suspicious activity. NASAO recommends that federal authorities develop standard guidance material for release to airport operators and local law enforcement officials, similar to the distribution of other safety related guidance material issued by the FAA.

  c. **Airport Security Plans.** Operators of general aviation airports should develop their own airport security plan based on guidance provided by federal authorities. The guidance should consider appropriate standards for each airport category mentioned earlier in this report. The guidance should be flexible and allow airport operators to tailor their plan to specific site and operating conditions. The Transportation Security Administration (TSA) should develop and distribute a self-inspection checklist to airport operators for their use in maintaining compliance with the new security standards. Federal authorities should perform periodic audits of airports to monitor and enforce compliance with this provision.

     Assigning the position of *Airport Security Coordinator* is highly recommended. The bigger, more active airports should create an *Airport Security Team* comprised of a representative from airport management, airport tenants and users, and local law enforcement officials. The teamís role should not be to write the security plan but rather to advise the *Coordinator* on issues affecting airport security. The security plan should be a written document, and it should be updated and approved periodically. Plan

approval should be obtained from an appropriate federal or state authority in order to maintain program consistency and to assure a high level of compliance. If state assistance is needed, additional federal funding will be required to administer the program. At a minimum, airport security plans should include:

i) a list of contact data for airport users including tenants and based aircraft owners.
ii) general and specific airport security standards.
iii) identification of the Aircraft Operating Area (AOA)
iv) procedures for reporting suspicious activity.
v) procedures for emergency response & communication.

Given the sensitive nature of this issue, NASAO advises against distribution, disclosure and availability of any sensitive information that could compromise airport security.

Additional Security Measures Recommended For All Airport Categories

d. **Public Awareness & Education.** A multi-faceted public awareness program should be developed to educate airport management, airport users, public safety officials and other community leaders as well as the general public on a wide range of issues involving the safe and proper use of airport facilities with a particular emphasis on security.

For instance, airport management could benefit from communicating more with airport tenants, paying more attention to airport users (airside and landside), engaging users for advice on ways to improve security while still maintaining an acceptable level of service. They could also benefit from recurrent security awareness training. Public safety officials, namely local police, could benefit from understanding airport user needs, learning about what constitutes suspicious activity, and most importantly, learning about standard airport operating procedures so as not to compromise airport or aircraft safety while performing police duties. Community leaders and the public at large could benefit from a better understanding of the value of their airport, learning about airport users and how they use it, and perhaps learn what not to be scared or concerned about.

e. **Monitoring Airport Property & Users.** Airport operators should perform regular inspections of their property and airport facilities including the aircraft operating area, fence lines (if applicable), fuel farm(s), NAVAIDS, etc.

Airport users should be encouraged to organize and implement a *Neighborhood Watch Program* for their airport whereby pilots, airport tenants and users voluntarily participate in vigilant monitoring of aircraft storage areas (e.g. ramps, aprons, hangars, etc.) and report unusual or suspicious activity to airport management and/or other appropriate government authorities.

f. **Controlling Movement in the AOA.** Airport operators should take reasonable measures to control the movement of persons, aircraft and ground vehicles in the aircraft operating area (AOA) by installing and maintaining appropriate airport user signs, aircraft guidance signs, airfield lights and pavement markings pursuant to FAA guidance. Signage, lights and markings are an important part of airfield safety, and by providing clear guidance to airport users they facilitate safe and efficient movement on the airport,

and that enhances airfield security by providing airport operators with better control of activity in the AOA.

It stands to reason that the more eyes watching out for unusual or suspicious activity the more likely it is that such activity will be noticed by someone and reported to the proper authorities. Control towers offer a security benefit during hours of operation by having well trained individuals monitoring and controlling aircraft movement within the AOA and in the airspace surrounding the airport. Controllers can also act as ìfirst respondentî and be an invaluable conduit for instant communication if unauthorized flight activity occurs in their airspace.

- NASAO supports the FAAís Contract Tower Program as a means of cost-effectively providing safety and security to airports and, therefore, recommends continued funding for this important program.

It should be stated that non-towered airports are no less safe or secure than those with control towers, however most airport operators of these facilities have fewer resources available to them for monitoring or controlling activity within the AOA. This seeming vulnerability to security is offset by the fact that unusual or suspicious activity at a small airport is easier to notice.

g. **Preventing Unauthorized AOA Access.** Airport operators should take measures to discourage unnecessary pedestrian and vehicular access into, and movement within, the AOA. If conditions warrant and funding permits, fencing and access control devices should be installed where appropriate. Pilots should be encouraged to walk to their planes instead of driving out on a ramp or apron. Within reason, airport operators should discourage the loading of supplies and equipment onto aircraft directly from ground vehicles without prior approval or supervision. Segregating aircraft and private ground vehicles increases airport safety and security.

Other Issues

FAA Pilot ID / Smart Card. Federal authorities should develop standards for a new pilot ID ìsmart cardî to replace the current FAA issued pilot ID. The new ID should include the pilotís photo and have special features (e.g. holographics, etc.) added to prevent counterfeit copying. This new smart card could be used to store certain data, including biometrics, for use by airport operators and government officials for verifying identification and for other security purposes. The ID should be renewed regularly, and a reasonable administrative cost should be charged to the pilot. This program could be administered uniformly by the federal government and/or by each state, seeking assistance from the Department of Motor Vehicles and/or Passport Centers.

ID Verification / Government Watch List. Flight schools and FBOs should properly identify individuals requesting flight lessons, renting or purchasing an aircraft or joining a flying club by validating their credentials using a government issued photo ID card and by checking the name against a government issued ìwatch listî of potential terrorist operatives prior to engaging in business. NASAO recommends that a pilot program be developed to facilitate the ID check, by electronic means, against the government ìwatch listî. This pilot program should be discrete, safe and easy to use, and it should also include the ability to automatically notify government authorities of a match. Upon ID verification, flight school and FBO personnel should engage

their patrons to learn more about intended use of the aircraft, intended destination, length of rental, anticipated return dates/times, etc. Flight instructors should accompany student pilots during the pre-flight inspection and personally distribute the aircraft keys to their students for all solo flights.

Mutual Assistance / Resource Sharing. An opportunity exists at the local level for sharing valuable local resources. Whenever appropriate, airport owners could provide low rent or rent-free space to local public safety officials including police and fire departments. Merely having a police presence on the airport will provide a natural deterrent to terrorism and other criminal activity. Having the local fire department on site will provide immediate response in case of an emergency. NASAO recommends the FAA make the necessary changes to offer public safety officials relief from paying fair market value on such leases, as long as an equivalent comparable level of service is provided for the lost revenue.

Emergency Communication / Response Network. NASAO recommends that airport operators develop and implement emergency procedures for responding to regional or national disasters, acts of terrorism, and other situations deemed to be an emergency by state or federal authorities. Among other things, establishing and maintaining a proper ìline of communicationî is critical to an effective response effort. It is important for state and local government officials to know whom to call in the event of an emergency. A single point of contact at all levels of government should be identified. Federal authorities must be included in the process, especially the FAA and the TSA. Time is of the essence during an emergency and it is very important that information flow efficiently from the source to its intended audience without being unnecessarily distorted. NASAOís National Emergency Information Network database should be a key component in that regard.

Funding. The demands that new airport security measures will place on the nationís GA airports simply cannot be funded solely with state or local monies. The only source of federal funding for general aviation airports is obtained through the FAAís Airport Improvement Program (AIP). However AIP moneys are generally limited to publicly-owned / public-use facilities included in the National Plan of Integrated Airport Systems (NPIAS). Unfortunately terrorism knows no bounds so new / additional funding must be made available to all public-use aviation facilities regardless of ownership or inclusion on the NPIAS. Last year, it was most appropriate for Congress to increase funding of security measures for airports that were previously subject to FAR Part 107 (now TSR Part 1542). However many commercial service airports are not subject to TSR Part 1542 so security projects at these facilities remain ineligible under AIP as do security improvements for every GA airport in the country.

Safety and maintenance projects are just as important to our national airport system as security improvements, so funding for these important capital projects must continue under AIP. Since AIP is currently the only source of federal funding for GA airports it must be increased and protected. A separate source of federal funding for security improvements at all public use airports must be established to supplement the AIP program.

NASAO recommends the following:

- Congress should increase the annual appropriation of AIP funding for the remaining time under the current multi-year program, AIR-21, to assure that security improvements for

eligible airports as well as other Airport Improvement Projects are each pursued in a timely manner.

- During AIP re-authorization, Congress should consider increasing the funding for GA apportionment, and, Congress should consider converting unspent non-primary entitlement dollars into GA apportionment dollars for reversion back to the states on an annual basis.

- During AIP re-authorization, Congress should revise funding eligibility standards to allow FAA funding for security improvement projects at GA airports.

- Under certain conditions (e.g. national security interests) the federal government should consider funding up to 100% of the cost of security improvements. Future funding for airport security improvements should be linked to strict compliance with federal security mandates, and could be enforced through a security audit by the TSA.

- Additional funding should also be made available to each state, possibly through planning grants, if their assistance is required to administer federal security programs.

Conclusion. General aviation is an essential ingredient in the national air transportation system by providing an indispensable link between local communities, private business and government. A safe and secure system of general aviation airports is a key component of the nationís inter-modal transportation infrastructure and economic vitality. Recent studies have shown that general aviation is a $64.5 billion industry employing over 637,000 people who earn nearly $20 billion annually. There are nearly 220,000 active general aviation aircraft flying four billion miles each year, assuring that 145 million passengers reach their destinations.

More than 65 percent of general aviation operations are conducted for business and public services. General aviation supports economic development by providing flexible, efficient and direct transportation of people and goods. It also provides other essential services such as emergency medical transport, law enforcement, fire fighting, aerial survey, aerial photography, agricultural and forest management.

Implementing meaningful and effective security measures at general aviation airports is essential if public confidence in the safety of air transportation is to be restored. Public confidence in general aviation is critical to maintaining and supporting growth in the direct and indirect economic benefits that general aviation airport tenants, businesses and users provide to local and regional economies. By ensuring safe and secure operations, airport businesses such as fixed-base-operators, flight training schools, agriculture aerial applicators, corporate users and other tenants will continue to provide the services, efficiencies and productivity benefits that are inherent to general aviation.

As real or perceived security delays and inconveniences increase for passengers using the nationís largest airports, air charter service and business aviation at general aviation airports become a more attractive travel alternative for many users. Security improvements at general aviation airports that ensure safe operations and maintain an acceptable level of service are necessary in order for airport businesses to remain economic catalysts to communities across the country.

While safety and security of the nationís air transportation system must remain the top priority at all levels of government, it is imperative to develop national GA security standards that protect this ì*national transportation asset*î without imposing unnecessary restrictions or unduly threatening its existence. NASAO is committed to working with federal authorities in this regard.

Respectfully submitted by the NASAO *Committee on Aviation Security*:

Robert J. Mallard, *Massachusetts* ñ Committee Chairman
R. Austin Wiswell, *California*
William J. Ashbaker, *Florida*
Bruce F. Mundie, *Maryland*
Kenneth L. Penney, Jr., *Nebraska*
Jack W. Ferns, *New Hampshire*
William D. Miller, II, *Oklahoma*
M. Patrick Morley, *Utah*
David W. Greene, *Wisconsin*

Henry M. Ogrodzinski ñ NASAO, President & CEO (Ex-Officio)