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**LASP RAISES SERIOUS CONCERNS FOR AMERICA'S SMALL  
AVIATION BUSINESSES; ASSOCIATION RECOMMENDS THAT LASP  
BE WITHDRAWN**

**Alexandria, VA, February 26, 2009** — Today, the National Air Transportation Association (NATA) submitted its comments on the Transportation Security Administration's (TSA) Large Aircraft Security Program (LASP) proposed rule. Unveiled by the TSA in October 2008, the LASP rule would govern operations for all aircraft weighing more than 12,500 pounds and require operators of those aircraft to implement an approved security program. The LASP proposal would, for the first time ever, require security programs for thousands of privately operated general aviation aircraft and ultimately seek to combine a number of security programs currently in place for general aviation, including the Twelve-Five Standard Security Program, into a single, uniform program.

The association's comments focus on the impact that the LASP proposed rule will have on aircraft operators and airports as well as numerous issues the Notice of Proposed Rulemaking (NPRM) raises that lie outside the scope of the proposed rule. Areas of concern addressed by NATA include:

**Airport Operators**

- Weight Threshold Justification
- Implementation
- Liability for Compliance
- Applicability
- CHRCs and STAs
- STA Expiration
- Watch List Service Providers
- Watch List Matching Costs
- Secure Flight
- Watch List Matching on International Flights
- Master Passenger List
- Third Party Audits
- Privacy Notices
- Prohibited Items List

**Airports**

- Applicability
- Airport Security Coordinator
- ASC at Multiple Locations
- Training of Law Enforcement
- Program Development and Implementation

**Issues Outside the Scope of This  
Rulemaking**

- Positive Pilot Identification
- Aircraft Owners
- Airports

"Overall, this NPRM demonstrates a troubling lack of knowledge and understanding of the general aviation community by the TSA," stated NATA President James K. Coyne.

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One of the biggest concerns the association addresses is the economic impact the proposed rule will have on the general aviation industry with little justification by TSA validating its issuance.

NATA commented, “The public should be permitted to review the agency’s justification for this rule. The Administration Procedure Act/Regulatory Flexibility Act requires a federal agency to weigh the costs of a proposed regulation against the anticipated benefits. The public has been unable to validate the TSA’s pronouncement that the benefits of this proposed rule in fact outweigh the costs because of the agency’s unwillingness to share data.”

Another significant concern to the association’s members is the Prohibited Items List (PIL). The TSA proposed that all LASP operators be subject to compliance with a PIL, similar to what exists with the Twelve-Five Standard Security Program (TFSSP). However, the PIL has been a difficult, if not impossible, requirement for most TFSSP operators since the program’s inception. As part of its comment submittal, the association has provided the TSA with a recommended revised list of prohibited items.

Commenting on the PIL, NATA stated, “General aviation aircraft are simply not outfitted with inaccessible baggage areas. NATA recommends the TSA draft a modified PIL for all LASP operators that maintains the level of security needed by the agency while maintaining the utility of general aviation aircraft.”

Concluding its comments on the LASP, NATA wrote the following:

“The proposed rule is a very discouraging outcome after years of work at the agency, during which the industry offered assistance to provide an effective, feasible means to address the TSA’s concerns. These offers of assistance were repeatedly declined by the TSA, and the resulting proposal reflects the agency’s refusal to work with the industry.

“However, NATA and other industry members once again ask the TSA to accept their offer of assistance. The only acceptable action for the agency to take is to withdraw the NPRM and assemble an official rulemaking committee, following the FAA’s Aviation Rulemaking Committee (ARC) model or similar. Alternatively, the TSA should consider industry feedback on this NPRM, draft and issue a SNPRM, and accept public comment one more time. Quite simply, the number of questions and inconsistencies in the NPRM demonstrates that this rulemaking is simply not ready for publication as a final rule.”

[Click here to view NATA’s comments on the LASP proposed rule.](#)

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NATA, the voice of aviation business, is the public policy group representing the interests of aviation businesses before the Congress and federal agencies.