



June 4, 2009

Support the TSA Authorization Act and the Castor Amendment

Dear Representative:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I urge you to support the Transportation Security Administration Authorization Act (H.R. 2200) which will make significant improvements to the security of our transportation network. I also urge you to vote for an amendment offered by Representative Castor which seeks to eliminate duplicative security credentials.

As we approach the 8th anniversary of the September 11, 2001 attacks on our country, we are reminded that much work remains to better secure our entire transportation system and to ensure that front-line workers are well-positioned to help address our security vulnerabilities. Toward this end, we applaud Chairman Bennie Thompson and the members of the Homeland Security Committee for reporting out legislation that will impose new security requirements and move to ensure that rules already on the books are quickly implemented.

Specifically, we support the provision in the bill that will finally ensure that flight attendants receive the uniform and mandatory security training they need to respond to threats in the aircraft cabin. Despite claims by some in industry, the costs of this program are minimal – it would add five hours of training to pre-existing safety training and would only occur every other year. This provision is a significant compromise from the original multi-day proposal and we simply do not see how industry can responsibly oppose it. The concept that workers themselves should have to pay for this mandatory training is ludicrous and we thank the Committee for rejecting this concept.

We also support the expanded training and support for the Federal Flight Deck Officer (FFDO) program. The bill provides that Federal Air Marshal Service field office facilities can be used for the FFDO activities. The section also allows for reimbursement of costs incurred by flight deck officers during requalification for this program, which is required to work as a flight deck officer. The bill also provides additional training for cargo pilots. For years, security regulations pertaining to cargo operations have been inadequate and this mandate will take an important step to address this problem.

Section 206 mandates the issuance of security standards for foreign and domestic aircraft repair stations performing maintenance work on U.S. aircraft. The provision also mandates that security standards at foreign stations working on U.S. aircraft are comparable to the security standards for maintenance work done in this country. These regulations were originally

Transportation Trades Department, AFL-CIO

888 16th Street, NW • Suite 650 • Washington, DC 20006 • tel: 202.628.9262 • fax: 202.628.0391 • www.ttd.org
Edward Wytkind, President • Patricia Fiend, Secretary-Treasurer



mandated by Congress in 2003 and were supposed to be finalized in August 2004. With over 70 percent of maintenance work now outsourced to domestic and foreign stations, security rules and the required inspections must be immediately implemented.

The TSA Authorization makes several urgently needed improvements to the Transportation Worker Identification Credential (TWIC) program. Section 403 requires the Coast Guard to coordinate with owners and operators of port facilities and vessels to allow TWIC applicants to be escorted on port facilities by a TWIC holder. This will provide relief to workers who have waited up to several months in some cases to receive their credential. Many now are suffering severe financial harm because, through no fault of their own, they cannot access their job sites. This section also reiterates the need for TSA to process applications in a timely manner by instructing TSA to respond to applicants within 30 days after receiving a completed application and creating a 30-day timeline for the review of requests for appeals and waivers. Additionally, this provision addresses serious deficiencies in the TWIC distribution process by allowing credentials to be sent to a card holder's home and subsequently activated at a TWIC enrollment center. These changes are absolutely essential to the creation of a functional and trustworthy TWIC program that improves our nation's maritime and port security.

Rep. Castor's amendment would prohibit a state or local government from imposing a separate, additional security check for a purpose for which a federal transportation security card has already been issued. Workers, for example, who have already applied for and received a TWIC should not be subject to additional and duplicate security checks for entering a port or a maritime vessel. The purpose of the TWIC and other federal security checks was to create a uniform credential that minimizes costs and creates one level of security. To allow states to impose their own security checks without any limitation would defeat one of the main goals of the TWIC and make it hard for workers and cargo to move from state to state. This is a modest prohibition and can be waived by DHS if a state can demonstrate a compelling homeland security reason for imposing additional security checks.

Again, I urge you to vote for H.R. 2200 and for the Castor amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a stylized flourish at the end.

Edward Wytkind
President