



**COMMENTS OF THE
TRANSPORTATION TRADES DEPARTMENT, AFL-CIO**

**BEFORE THE
TRANSPORTATION SECURITY ADMINISTRATION
DEPARTMENT OF HOMELAND SECURITY
REQUEST FOR COMMENTS
AIRCRAFT REPAIR STATION SECURITY
Docket No. TSA-2004-17131**

February 19, 2010

On behalf of the Transportation Trades Department, AFL-CIO (TTD), we are pleased to submit the following comments on the Transportation Security Administration's (TSA) Notice of Proposed Rulemaking (NPRM) that would establish general security requirements for aircraft repair stations. TTD represents 32 affiliated transportation unions¹, including, the International Association of Machinists and Aerospace Workers (IAM), the Transport Workers Union of America (TWU), and the International Federation of Professional and Technical Engineers (IFPTE) that represent mechanics and aviation engineers. In addition, the Professional Aviation Safety Specialists (PASS), a TTD member union, represents Federal Aviation Administration (FAA) employees who conduct safety inspections of repair stations. Our aviation unions also represent airline pilots, flight attendants, air traffic controllers, FAA technicians, airline customer service representatives, and airport workers who depend on a safe and secure aviation system.

TTD has actively participated in the debate over aircraft repair station security and has long sought to bring one level of security to contract maintenance operations, especially those facilities located in foreign countries. As we have advocated for legislation and regulation governing the security of contract repair stations, our concerns have only grown in the aftermath of the September 11, 2001 terrorist attacks and the corresponding rise the outsourcing of heavy airframe maintenance work to foreign repair stations.

We want to thank TSA for issuing this proposal and for moving to address the long ignored issue of aircraft repair station security. As you know, Congress first moved to impose security standards in the FAA Reauthorization Bill of 2003 — Vision 100 (P.L. 108-176). Specifically, Section 611(b) of this bill required TSA, in consultation with the FAA, to complete a final rule imposing security standards on foreign and domestic aircraft repair stations by August 2004 and to subsequently conduct security inspections of foreign stations. Additionally, Section 611 (a) required the FAA (within 90 days) to submit a plan to strengthen the oversight of both domestic and foreign repair stations and to ensure that foreign stations, certified by the FAA, are subject to an equivalent level of safety, oversight and quality control as U.S. stations.

¹ TTD is the transportation labor umbrella organization of the AFL-CIO. A complete list of TTD affiliated unions is attached.

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