



A bold voice for transportation workers

July 15, 2013

Ms. Virginia Wise
Office of Security Policy and Industry Engagement
Surface Division, TSA-28
Transportation Security Administration
601 South 12th Street
Arlington, VA 20598-6028

**RE: Request for Comments on Security Training Programs for Surface Mode
Employees
Notice; Request for Comments
Docket No. TSA-2013-0005
RIN 1652-AA55**

Dear Ms. Wise:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I write to comment on the Transportation Security Administration's (TSA) Notice and Request for Comments on Security Training Programs for frontline workers in the rail, public transit and over-the-road bus industries. By way of background, TTD consists of 33 affiliated unions that represent workers in the transportation sector, including many of the workers who are covered by the security training mandate that is the subject of this proceeding.¹

At the outset, we express our strong support for the security training program requirements mandated by Congress in the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act). During debate on that legislation, TTD and our affiliates advocated for provisions to ensure that frontline transportation workers are trained on addressing potential security threats, that their training incorporates certain minimum elements, and that the training programs are reviewed and approved by the Department Homeland Security (DHS) Secretary. As TSA continues to develop the Notice of Proposed Rulemaking (NPRM) to implement these provisions, we urge the agency to ensure its rulemaking strengthens security by adhering to the congressional mandate of the 9/11 Act.

¹ Attached is a complete list of TTD affiliate unions.

Transportation Trades Department, AFL-CIO

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Edward Wytkind, President / Larry I. Willis, Secretary-Treasurer



In order for the security training programs to be effective, employers must be required to include the minimum standards established by Congress. Ensuring that frontline employees are able to determine the seriousness of a threat, to communicate and coordinate with fellow workers and passengers, and to be versed in evacuation and security incident procedures, is critical during emergency situations. While we agree that some flexibility may be needed to take into consideration the uniqueness across the affected industries, all training programs must include core elements to ensure a minimum level of instruction. Congress voted for the elements specified in the 9/11 Act and TSA has the responsibility to fulfill the mandate.

We appreciate that some employers already have existing security training programs in place, and we recognize that some plans may currently comply with the security training provisions. However, all training programs, whether newly established or pre-existing, must be reviewed and approved by the DHS Secretary, and programs found to be noncompliant must be remedied. Doing so will ensure that all plans will properly train workers on how to assess and respond to security threats thereby helping to improve the security of our rail, transit and bus systems.

TTD notes that pursuant to the statute, TSA was supposed to issue regulations to implement the 9/11 Act provisions within one-year of enactment for public transportation employees, and within six months for both railroad and over-the-road bus workers. Since Congress passed the law in 2007, TTD has consistently urged TSA to issue these important regulations; however, nearly five-and-a-half years later, the agency has failed to do so. While we appreciate that in this docket TSA is seeking information on current training programs, the agency must move forward with issuing a rulemaking to implement this mandate.

The men and women we help represent work on the front lines of our transportation system and want to ensure its security more than anyone else. But in order for these workers to protect themselves, passengers and the integrity of the systems they work in, TSA must ensure frontline workers receive the training that Congress directed and do so as soon as possible. We appreciate the opportunity to provide comments.

Sincerely,

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

Edward Wytkind
President

TTD MEMBER UNIONS

The following labor organizations are members of and represented by the TTD:

Air Line Pilots Association (ALPA)
Amalgamated Transit Union (ATU)
American Federation of Government Employees (AFGE)
American Federation of State, County and Municipal Employees (AFSCME)
American Federation of Teachers (AFT)
Association of Flight Attendants-CWA (AFA-CWA)
American Train Dispatchers Association (ATDA)
Brotherhood of Railroad Signalmen (BRS)
Communications Workers of America (CWA)
International Association of Fire Fighters (IAFF)
International Association of Machinists and Aerospace Workers (IAM)
*International Brotherhood of Boilermakers, Iron Ship Builders,
Blacksmiths, Forgers and Helpers (IBB)*
International Brotherhood of Electrical Workers (IBEW)
International Longshoremen's Association (ILA)
International Longshore and Warehouse Union (ILWU)
International Organization of Masters, Mates & Pilots, ILA (MM&P)
International Union of Operating Engineers (IUOE)
Laborers' International Union of North America (LIUNA)
Marine Engineers' Beneficial Association (MEBA)
National Air Traffic Controllers Association (NATCA)
National Association of Letter Carriers (NALC)
National Conference of Firemen and Oilers, SEIU (NCFO, SEIU)
National Federation of Public and Private Employees (NFOPAPE)
Office and Professional Employees International Union (OPEIU)
Professional Aviation Safety Specialists (PASS)
Sailors' Union of the Pacific (SUP)
Sheet Metal, Air, Rail and Transportation Worker (SMART)
Transportation Communications International Union (TCU)
Transport Workers Union of America (TWU)
UNITE HERE!
United Mine Workers of America (UMWA)
*United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service
Workers International Union (USW)*
United Transportation Union (UTU-SMART)

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