



As many of you know, the Department of Homeland Security Office of Inspector General released a report this morning that discusses the strengths and weaknesses of the Transportation Security Administration's efforts to secure air cargo during ground transportation and handling before it is loaded onto planes for air shipment. A full copy of the report can be found here: http://www.dhs.gov/xoig/assets/mgmttrpts/OIGr_10-09_Nov09.pdf

While the findings in the report are concerning to our members, these issues are not new and are the very ones that our industry has raised in the past. We have been in close touch with other forwarding associations and are distributing a statement for the media on the report. Additionally, we will be following up with Congress on the report and our industry's response.

The report focuses on three areas the TSA needs to improve:

- First, the DHS found that personnel were sometimes accessing, handling, or transporting air cargo without the required background checks or training. They reviewed drivers' records and identified that 23% did not satisfy the required training and testing requirements.
- Next, TSA's security programs are not as sound as they thought. The representatives from the DHS gained access to air cargo through an unmanned door with a defective lock. Although an alarm sounded, no warehouse personnel responded to challenge their access.
- Lastly, the TSA's inspection process has not been effective in ensuring that requirements for securing air cargo during ground transportation are understood or followed. Regulated entities' employees or authorized representatives either did not take the initial or annual recurrent security training and pass the required examinations or could not provide evidence of meeting these requirement. As a result, they assert that air cargo is vulnerable to the introduction of explosives and other destructive items before it is loaded onto planes, potentially creating risks for the traveling public.

The DHS provided six recommendations to the TSA. Four of these are particularly important to our members:

Recommendation #1: Mitigate access control vulnerabilities by:

- a) Requiring more tests for access vulnerabilities and provide corrective actions to the regulated entities;
- b) Placing more focus on entities that are not following the access control requirements; and
- c) Requiring inspectors to spend more time promoting awareness of access control vulnerabilities and their impact on cargo security.

Recommendation #2: Improve the security threat assessment process by:

- a) Requiring regulated entities to maintain copies of documents reviewed for authenticating the identity of an applicant;
- b) Revising the application form to include language noting that failure to provide a Social Security number may delay or prevent completion of the security threat assessment process; and
- c) Requiring TSA's Office of Transportation Threat Assessment and Credentialing to vet applicants

Recommendation #3: Enhance training and testing requirements by providing more specific guidance to regulated entities regarding the training and testing requirements. Additionally, TSA should revise the Regulatory Activities Plan to

allow more time for inspectors to review these requirements.

Recommendation #4: Revise the Regulatory Activities Plan to allow more time for inspectors to:

- a) Incorporate a risk-based approach that emphasizes the use of historical data and analysis; and
- b) Provide support and education to the regulated entities to ensure that cargo security requirements are understood and implemented.

If you have any questions or comments regarding these recommendations, please contact AfA Staff.

Sincerely,
Brandon Fried
Executive Director
The Airforwarders Association
750 National Press Building
529 14th Street, NW
Washington, D.C. 20045
202-393-2818

You are subscribed as daveh@trans-soft.net
[EasyUnsubscribe](#) ([by email](#)) | [My Settings](#)