



February 9, 2007

The Honorable Daniel Inouye
 Chairman, Senate Committee on Commerce,
 Science and Transportation
 722 Hart Senate Building
 Washington, DC 20510

Dear Chairman Inouye:

As the Senate Commerce, Science and Transportation Committee begins consideration of S. 509, the "Aviation Security Improvement Act," and its specific provisions to enhance the Transportation Security Administration (TSA) programs for screening air cargo, the undersigned associations urge a focus on realistic solutions based on a framework that identifies and prioritizes risks, works methodically to apply effective and proven security measures, and that optimizes federal and industry resources. We ask that you provide TSA with both the appropriate resources and sufficient flexibility to accomplish this task. To this end, it is important to resist the temptation to prescribe blanket standards and/or measures that cannot be met and that, in the end, will work counter to the common goal of ensuring the safety and security of all airline passengers and crews.

Our coalition represents a broad range of air cargo supply-chain participants including producers and shippers of goods, air freight forwarders, passenger and cargo airlines, airports and retailers who rely upon express delivery to serve their customers. We have worked cooperatively with TSA in support

of its air cargo security programs including the implementation of the Air Cargo Security Requirements Final Rule. We recognize that government and industry must address threats and vulnerabilities in air cargo, but this task must be accomplished in a manner that allows for the continued free flow of commerce that is so vital to this nation's economic security. For this reason we support reasonable, risk-based measures along the supply chain. Such a system would be multi-layered and comprehensive. It should incorporate expanded use of canines by TSA for explosives detection, incentives for shippers to strengthen supply-chain security practices, threat assessment and targeting, and increased inspections for elevated-risk cargo.

S. 509 generally embraces these concepts, yet there are provisions that are in conflict with these principles. First, the provision that equates screening of air cargo with that of checked baggage risks the establishment of an unachievable standard. The very nature of air cargo dictates that it be screened in a different manner than is checked baggage. Checked bags are relatively small, lightweight and carried individually, making them ideal for screening by explosives-detection machines. The majority of cargo that arrives at an airport is already contained on a pallet and shrink-wrapped, or within a crate or similar container. Neither airlines nor TSA can break those shipments down to be screened in a manner comparable to checked baggage, as the bill implies, yet explosives detection canine teams can screen such shipments, making them the ideal screening option in air cargo environment. Furthermore, the additional security that will be created by TSA's establishment of a "certified shipper" program will add a new layer of security at other points along the supply chain.

Next, the language to establish a program for the utilization of blast-resistant cargo containers and to fund related research runs counter to directing TSA to utilize risk analysis and prioritization in securing the cargo that is carried on passenger aircraft. The idea of knowingly placing "suspect cargo" on airlines, regardless of whether or not it is in a blast-resistant container, is contradictory to airline safety and security measures currently in place. The result is a costly mandate on TSA to research, develop and acquire these very expensive cargo containers, costing as much as \$20,000 per unit, and potentially upon the airlines if TSA requires their usage. We believe that the resources that would be dedicated to such a program would be much better utilized if committed to expanding the TSA National Explosives Detection Canine Team Program and other effective TSA screening efforts.

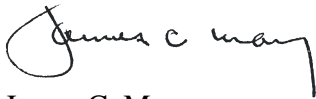
As you proceed to consideration of the bill, we urge you to keep the above principles in mind, as well as the following information:

- There is no existing technology to allow for efficient physical inspection of 100 percent of air cargo;
- Small community air service is often reliant upon cargo revenues to remain viable;
- "Open box" inspections of cargo, as is often required by today's regulations, is extremely disruptive to commerce, often damages or destroys shipped products, put airline employees at risk unnecessarily and is less effective than screening by canines;
- Blast-resistant containers are twice as expensive and twice as heavy as standard air cargo containers. They can only be used on wide-body aircraft, which account for only 14 percent of the U.S. airline fleet, and are unsuitable for a significant quantity of cargo in the passenger system, much of which is palletized or larger than can be accommodated by containers.

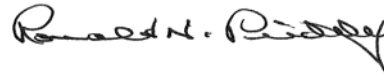
Not only are the undersigned associations unified around these recommendations for improving our nation's system of screening air cargo on passenger aircraft, we are also in agreement that aviation security is national security and, as stated in the Aviation and Transportation Security Act that created TSA, is a federal function. Consequently, we are opposed to the creation of additional mandatory taxes and/or fees to fund these programs. Airlines, airports, forwarders and shippers already bear billions in taxes, fees and unreimbursed mandates for aviation security in spite of Congress' clear intent that TSA fulfill this role.

Thank you for your consideration of this matter of great concern to us and of significant consequence to our nation's economy.

Sincerely,



James C. May
President and CEO
Air Transport Association



Ronald N. Priddy
President
National Air Carrier Association



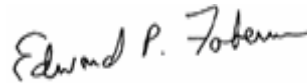
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