

Mid Atlantic Freight, Inc., 6423 Bryan Blvd, Greensboro, NC 27409

Mid Atlantic Freight, Inc. is an "on demand" air cargo carrier certificated under part 135 of the Federal Aviation Administration (FAA) Regulations. Several questions have arisen from review of the NPRN.

How would SIDA requirements be instituted at small airports & rural airports?

It appears that the proposed regulations would require Mid Atlantic Freight, Inc. to obtain TSA certification for all employees who might have access to cargo. If taken to the extreme, the proposed regulations would require us to have every employee who is potentially inside of an airport fence to be certificated by the TSA including, a criminal background records check, a threat assessment under part 1540 subpart C or another security threat assessment approved by TSA or escorts would be required for employees or other personnel without background checks and threat assessments. As all air cargo airline employees have potential access to cargo, including, pilots, mechanics, ramp workers, those who load and unload aircraft and those who marshal aircraft, office personnel, etc., all would need a Security Threat Assessment. Clerical employees and others also are often around cargo in the loading and unloading or receipt of shipment process. Clarification is needed as to what the proposed rule making envisions in terms of who will need to have full threat assessments and/or background checks done.

How do we open a specialized package designed to protect the pilots and other cargo from its contents, and then re-seal it with confidence that we have not compromised its integrity?

What will actually be required in terms of package screening? Is there a requirement that each package be opened? How will these inspections be accomplished at small rural airports?

How will "known shipper" be defined? Will the definition be the same for all types of freight? Will the "known shipper" process be expanded to include the small airplane operators?

What type training will be required as a result of the proposed regulations and who will do the training? What recurrent training requirements will apply.

Mid Atlantic Freight, Inc. and other air cargo carriers, of course, are vitally interested in the issue of cargo security. We are specifically interested in bringing the input of the FAR 135 on-demand cargo-only operators of small aircraft, serving smaller, rural, and undeveloped airports, into TSA's development of the final rule.