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VIA ELECTRONIC FILING

Docket Management System
U.S. Department of Transportation
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590-0001

Re: Notice of Proposed Rulemaking Regarding
Air Cargo Security Requirements (Docket TSA-2004-19515)

Dear Sir or Madam:

Thai Airways International Public Company Limited ("Thai") submits these Comments on the Notice of Proposed Rulemaking ("NPRM") regarding Air Cargo Security Requirements of the Transportation Security Administration ("TSA") published on November 10, 2004.

Thai is the national carrier of the Kingdom of Thailand. Thai operates domestic, regional and intercontinental flights from its home base in Bangkok, including flights to the United States (Los Angeles). Thai is a member of the Association of Asia Pacific Airlines ("AAPA"), which has commented separately on the NPRM. As a supplement to those comments, in which Thai joins, Thai wishes to respond to the TSA's request for comments on the question of whether the NPRM goes far enough to ensure security for belly cargo transported on passenger aircraft.

The NPRM was developed by the Transport Security Administration, with the assistance of the Aviation Security Advisory Committee, which offered many recommendations that form core elements of the NPRM. The NPRM proposes to codify a threat-based, multi-layered approach to cargo security that seeks to tailor security requirements with the appropriate level of perceived threat. With such an approach, carriers can safely and effectively continue to transport belly cargo on passenger flights, which generates a valuable source of revenue and provides an essential transportation option for international shippers. Although the TSA considered prohibiting all cargo from transportation on passenger aircraft, the TSA correctly concluded that such a prohibition would have a "significant economic impact on passenger operations." 69 Fed. Reg. 65258, 65266. Indeed, such a draconian approach would severely impair the economic viability of passenger services, drive competitors out of the marketplace and reduce service to the United States, with serious repercussions on trade and tourism. The TSA correctly rejected such an approach, and instead fashioned the NPRM with a view to addressing possible gaps in

security screening without causing serious disruption or economic harm to airlines, shippers or consumers.

Thai supports the principles behind the TSA's proposed approach and agrees with the goal of striking an appropriate balance between enhancing cargo security while facilitating efficient cargo carriage. Thai would underscore, however, that these goals can be best achieved by enhancing international cooperation on issues of cargo security. Greater integration with cross-national industry working groups, such as the Global Aviation Security Action Group, will help ensure that the most effective and efficient international standards are developed. Such cooperation should include efforts to establish harmonized international screening standards, enhance cooperation on joint security programs, develop secure international databases of known shippers for automated shipper verification, and the like. Absent these joint efforts, a unilateral approach is more likely to impose onerous burdens and requirements that materially conflict with the security programs or screening procedures established by other national authorities. Such conflicting standards are an impediment to effective security and unnecessarily impede efficient international operations.

Thai submits that enhanced efforts to achieve a unified approach to global security challenges will produce greater security and, at the same time, enhance the efficiencies of carriers' cargo operations. Such efficiencies will, in turn, support a more vigorous and vital global economy. As such, air cargo harmonization efforts should be at the forefront of future security endeavors.

Respectfully submitted,



Cathleen P. Peterson

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THAI AIRWAYS INTERNATIONAL PUBLIC
COMPANY LIMITED