



General Manager, Aviation Security and Public Safety  
7000 N.E. Airport Way  
Portland, Oregon 97218  
(503) 460-4492

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**Submitted electronically via DOT docket website**

January 10, 2004

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, SW  
Washington, DC 20590-0001

RE: Docket No. TSA-2004-19515  
Air Cargo Security Requirements  
Notice of Proposed Rulemaking

**Comments from Portland International Airport (PDX)**

PDX is appreciative of the opportunity to submit comments and questions in regard to the Notice of Proposed Rulemaking (NPRM) on Air Cargo Security Requirements. We also commend the TSA for establishing the working groups and using the NPRM process to develop these proposed new security requirements. PDX believes that the NPRM process is the most effective method currently available for the TSA to make regulatory changes and strongly encourages TSA to do the same for the litany of mandates placed on airport operators (AOs) and aircraft operators through numerous security directives since 9/11 that are not reflected in TSRs 1542 and 1544.

PDX has the following comments in the two areas listed below:

1. **Security Threat Assessments (STAs)**, Section 1540.203(b)(2): PDX recommends that the STA process be better defined to answer such questions as A) where will STAs be submitted, locally or to HQ TSA? B) What criteria will be used to qualify or disqualify individuals. Individuals should know this so that those who do not qualify do not waste everyone's time. C) AOs have had to add staff and develop a very involved process for resolving discrepancies with CHRCs (such as when an individual has a felony arrest but the CHRC doesn't state whether there was a conviction). Who will be doing this for TSA and how will discrepancies be resolved? We support ACI-NA's recommendation to make the STA and CHRC disqualifying criteria consistent. We would also recommend that TSA look at making the CHRC disqualifying crimes (TSR 1542.209) consistent with the background checks performed by Customs and Border Protection (CBP) for their Customs security area seals.
2. **Expansion of SIDA**, Section 1542.205: A) Expanding the SIDA on airports to the interior of leasehold facilities with mixed use (warehouse, office, storage, etc.) and multiple tenants is problematic from an implementation and an enforcement standpoint. PDX recommends that

language be added to this section so that it only applies to the handling of cargo being loaded onto or unloaded from aircraft. This is similar to the standard applied for the CBP security area seals. If TSA would like to have SIDA-like requirements enforced in leasehold spaces, we would suggest that they be placed in TSRs 1544, 1546 and 1548. B) PDX also recommends that this section (subsection (a)(2) in particular) be clarified so that it is clear that the intent of this subsection is not to create SIDAs off-airport. Creating SIDAs at off-airport handling and sorting facilities is extremely problematic. If it is TSA intent to do so, then it should be made clear that the AO has no responsibility for off-airport SIDAs.

Thank you again for the opportunity to comment so that our joint efforts to keep airports safe and secure will be successful. PDX also support the comments of ACI-NA and AAAE to this NPRM.

Should you have any questions concerning our comments, please do not hesitate to contact me at (503) 460-4492 or [crosbm@portptld.com](mailto:crosbm@portptld.com).

Sincerely,

*//signed//*

Mark A. Crosby  
General Manager, Aviation Security and Public Safety  
Portland International Airport

cc: Robert E. Jackson, TSA FSD-PDX  
Gail Levario-AFSD Regulatory/Inspection  
Carter Morris & Rebecca Morrison-AAAE  
Ian Redhead-ACI/NA