



Indianapolis Airport Authority



Indianapolis International Airport

Managed by BAA Indianapolis LLC

2500 S. High School Rd  
Suite 100  
Indianapolis, IN 46241

Tamika McCree  
Transportation Security Administration  
Office of Transportation Security Policy  
601 South 12<sup>th</sup> Street  
Arlington, Virginia 22202

January 4, 2005

Dear Tamika,

The Indianapolis International Airport IND has reviewed the Notice of Proposed Rulemaking [NPRM] concerning Air Cargo Security Requirements that was distributed November 10, 2004. Below are our comments as to the interpretation of the NPRM, issues, and possible economic impact to IND.

*The NPRM on air cargo security on November 10, 2004, identifies measures to enhance air cargo security. Proposed changes affect four segments of the air cargo industry: (1) airports serving cargo operations; (2) passenger aircraft operators that transport cargo; (3) all-cargo aircraft operators; and (4) indirect air carriers (IAC). Recommended amendments would combat two critical vulnerabilities in the current air cargo environment: (1) the hostile takeover of an all-cargo aircraft leading to its use as a weapon; and (2) the use of cargo to introduce an explosive device onboard a passenger aircraft in order to cause catastrophic damage.*

*Key issues for airport operators: TSA envisions securing the cargo operating environment by designating cargo operating areas as SIDAs. TSA defines cargo operating areas as: "...areas where cargo is regularly sorted, loaded or unloaded by certain aircraft operators or foreign air carriers." These cargo SIDAs would include regularly used facilities and would only be extended to areas on airport grounds. It is the belief at IND that the cargo SIDAs would [REDACTED]*

*Further, that cargo SIDAs [REDACTED] TSA regulations specify only the following requirements for a SIDA: (1) establish and carry out a personal identification system; (2) subject each individual to a criminal history records check (CHRC); and (3) train each individual before granting unescorted access. Accordingly, IND has identified [REDACTED] areas [REDACTED] which would classify as cargo SIDAs: (see attached airport map for graphic view)*

[REDACTED]

*The above definition of a cargo operating area would [REDACTED] used by [REDACTED] since these locations, although on airport property [REDACTED]*



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Companies currently operating in areas [redacted] listed above already [redacted] and designating these areas a SIDA would have little or no impact on us once designated as a cargo SIDA.

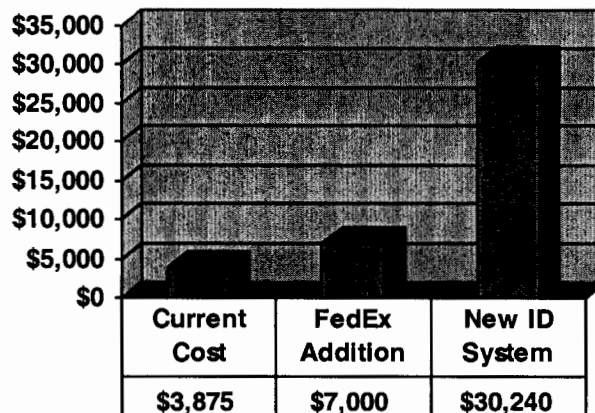


Additional projected cost factors for IND related to the Cargo SIDA proposal in the Air Cargo NPRM fall into two categories: (1) airport costs to issue SIDA IDs for FedEx; and (2) cost to FedEx [redacted]

Projected cost to the airport if we are required to issue SIDA IDs to FedEx employees:

- FedEx's approximate 2,500 employees would increase our SIDA badge total by 80% and require the addition of at least one part-time employee for the badging office. A conservative estimate of \$16,224.00 per year (24 hrs per week x \$13.00 per hr) would be required for this part-time employee.
- Initial cost of about \$3,125.00 (\$1.25 per badge for current cards and printer ribbon) to issue SIDA IDs to FedEx employees;
- Reoccurring cost of an additional \$3,125.00 (given the current identification system and in today's dollars) added to the cost of the current 3,100 SIDA IDs (\$3,875.00) equals \$7,000.00 [redacted]. The cost to [redacted] all 5,600 employees could increase in the coming years to \$30,240.00 with an estimated cost of \$5.40 per ID (card and printer ribbon) for the new [redacted] system [redacted].

The following chart depicts the estimated airport cost of [redacted] if we are required to issue SIDA badges to FedEx employees:



Projected cost to FedEx [redacted] for the cargo area:



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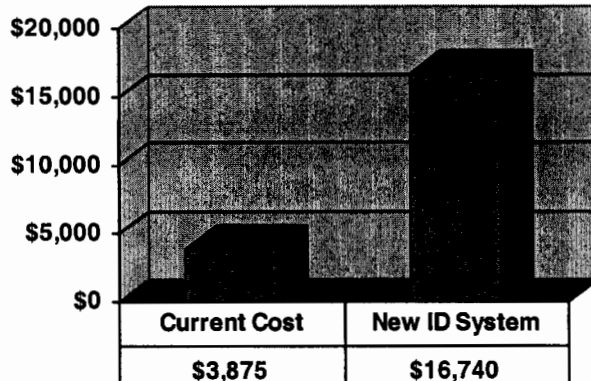
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The following chart depicts estimated airport cost of [redacted] without FedEx employees:



However, any future increased security measures will now include the cargo SIDA as well [redacted] etc).

Key issues for cargo operators: Cargo operators by far bear the brunt of the proposals in the NPRM, and the mostly costly of which will be the screening requirement. Additional security measures proposed include:

- **Background Checks for Cargo Workers:** TSA proposes that all personnel working in the cargo SIDA submit to a fingerprint-based CHRC. No impact to current cargo operators at IND is foreseen [redacted]

[redacted] However, in the cargo environment, many other persons have access to cargo before someone who works for the airport [redacted] handles it. Therefore, TSA proposes to require additional persons who have unescorted access to air cargo, but do not have unescorted SIDA access, to undergo a Security Threat Assessment. This assessment is focused on the threat of terrorism and would rely on checks of existing intelligence-based records and databases to ensure that an individual who is a known or suspected threat is prohibited from working in positions that could allow that individual to have unescorted access to air cargo. This will have a cost impact to trucking companies, freight handlers, IACs, etc.

- **Establish All-Cargo Operator Standard Security Program:** TSA proposes that aircraft operators operating all-cargo aircraft with a maximum certificated takeoff weight of more than 45,500 kg (100,309.3 pounds) have an all-cargo program under proposed 1544.101(h) & (i).
- **Security Measures for Persons Boarding an All-Cargo Aircraft:** TSA proposes requirements for screening persons other than passengers boarding the all-cargo aircraft with a maximum certificated take-off weight greater than 12,500 pounds.
- **Screening Cargo:** To guard against unauthorized weapons, explosives, persons and other destructive substances or items in cargo, TSA proposes to codify a requirement for aircraft operators to inspect a portion of air cargo, including that offered by known shippers. TSA recognized that 100% inspection of all cargo would severely burden on-time delivery and have



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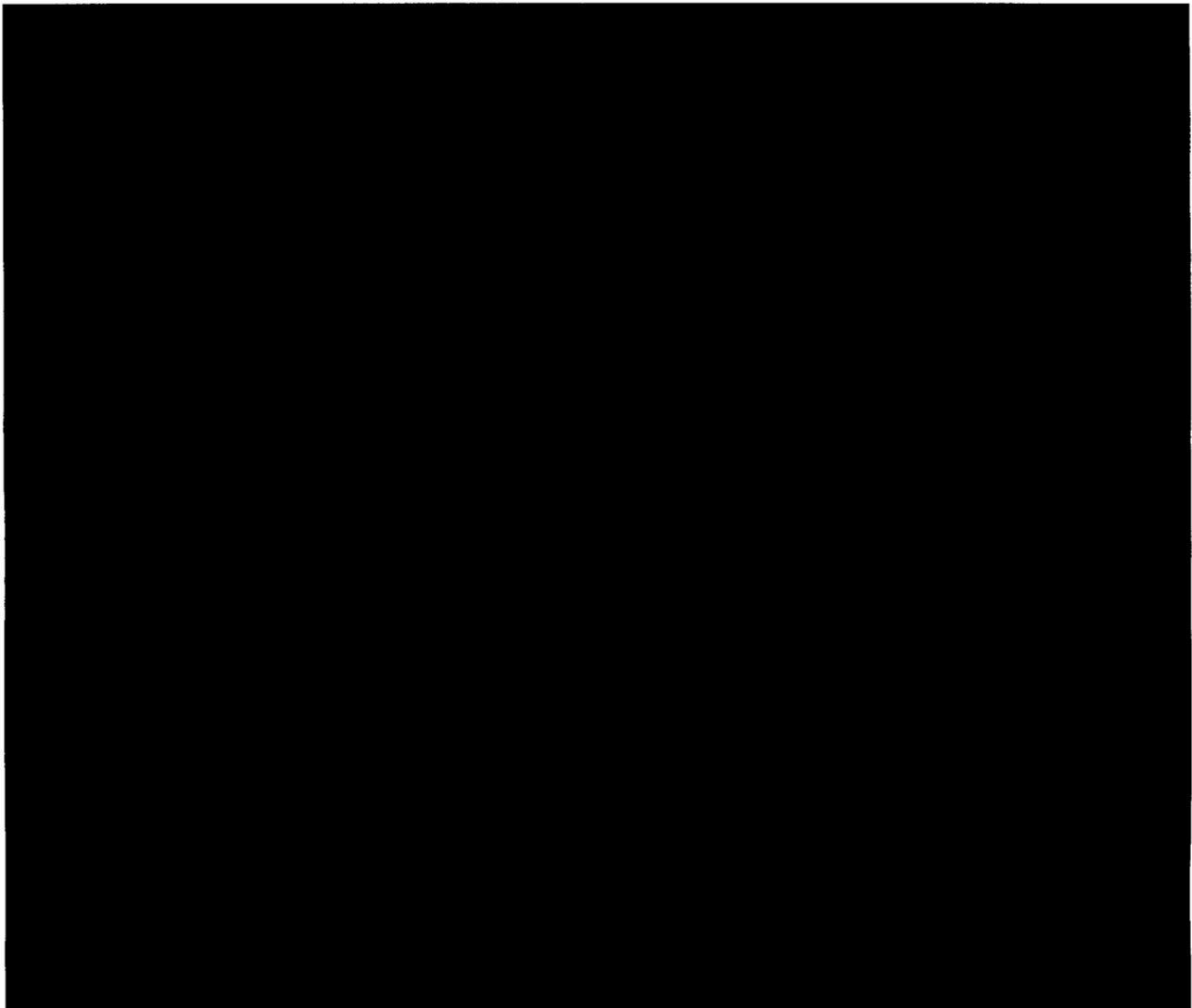
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*severe negative impact on aircraft operators. Cargo screeners would be required to undergo the same CHRC as cargo workers in the SIDA. It is unknown at this time if the cargo operator would bear the entire cost of the screening workforce or if TSA will cost share.*

- **Accepting Cargo:** TSA proposes to authorize aircraft operators under full or all-cargo programs to accept cargo only from the shipper, or from an entity with a security program comparable to the aircraft operator's. Aircraft operators would be required to have a Known Shipper program including measures to ensure the shipper's validity and integrity, to inspect or further screen cargo, and to provide shipper data to TSA.

■ **Security of Aircraft and Facilities:** Proposal would require operators of aircraft operating under a full or all-cargo program, to prevent unauthorized access to the operational area of the aircraft while loading or unloading cargo ■■■■■  
■■■■■





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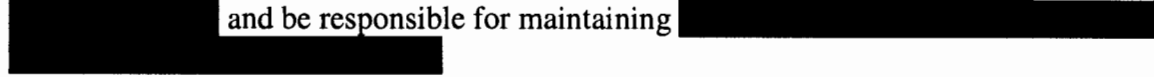
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In closing, IND would request that FedEx be allowed  
and be responsible for maintaining



Respectfully submitted,

A handwritten signature in black ink that reads "Bill Reardon".

Bill Reardon  
Airport Security Coordinator  
Indianapolis International Airport  
2500 S. High School Road  
Indianapolis, Indiana 46241  
317-487-5395