



October 9, 2013

Transportation Security Administration
Attention: OSPIE Aviation-Airports (TSA-28)
601 12th Street South
Arlington, VA 20598-6028

RE: Transportation Security Administration request for reconsideration of decision to shift exit lane security responsibility to airports.

The California Airports Council (CAC) strongly urges you to reconsider the Transportation Security Administration's (TSA) proposal to cease staffing airport terminal exit lanes on January 1, 2014. In May, the CAC wrote a letter to all members of the California congressional delegation and House Appropriations Committee warning of the extensive negative impacts this decision could have on airports. We have also submitted comments to TSA, further articulating our firm disapproval of this proposal. The CAC comprises the 31 commercial airports in California, representing more commercial aviation activity than any other single state.

As stated in our previous letter, exit lane staffing has never been the responsibility of airports. After 9/11, Congress delegated the responsibility for airport security to the TSA. Nevertheless, airports – and local governments – have incurred significant post-9/11 security capital and operating costs and this proposal adds a new level of responsibility, as well as substantial new operating costs for airports. The staffing of a single exit lane can impose upon airports a cost ranging from \$80,000 per year at a smaller airport to \$200,000 at a larger airport, resulting in millions of dollars in additional fiscal year costs.

This proposal also sets a troublesome precedent if the TSA is allowed to retreat from statutory security screening and access control responsibilities based on fiscal constraints. This creates budgetary and liability uncertainty for airports if other TSA responsibilities are potentially subject to similar unilateral and arbitrary abdications in the future. TSA plans to implement its proposal through an amendment to airports' Airport Security Programs. While airports and airlines have been provided an opportunity to submit comments, we believe the process has been more formality than substance since TSA has not made any changes based on input from these two key stakeholders.

The CAC unanimously urges you to reverse this decision to sustain the agency's mandated responsibility for screening and exit lane control.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rod Dinger', with a stylized flourish at the end.

Rod Dinger
President

Cc: CA Congressional Delegation

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