



July 11, 2013

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

RE: Opposition to Revision 1.1, dated June 4, 2013 – Proposal to Relinquish Responsibility for Exit Lane Security Personnel and Designate Airports Responsible.

The California Airports Council (CAC) strongly opposes the proposal to cease staffing airport terminal exit lanes and turn this duty and expense over to airports. The California Airports Council is comprised of the 33 commercial airports in California serving over 167 million total passengers in 2012.

Exit Lane Responsibility and Cost

The staffing of airport exit lanes has never been the financial responsibility of airports. After 9/11, Congress directed the responsibility for airport security to the TSA. As this transition was implemented and continues to evolve, airports and their local governments have also incurred significant post-9/11 security capital and operating costs. This proposal adds a new level of responsibility, as well as substantial new operating costs for airports. Staffing of a single exit lane can impose costs ranging from \$80,000 per year at a smaller California airport to \$200,000 at a larger airport. The result of this proposal will be to shift millions of dollars in additional fiscal year costs to California airports.

Maintain the Current Model

Currently, funds are collected from airlines to offset the cost of this element of TSA responsibility. The California Airports Council suggests this model is viable and should be continued as an important component of the overall mission of the TSA to control access to airport secure areas.

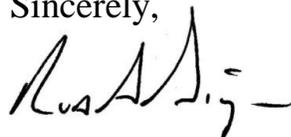
California airports are also deeply concerned about the precedent whereby the TSA seeks to relinquish a role and responsibility once considered a vital function. The resulting impact on California airports is budgetary and liability uncertainty if other TSA responsibilities are potentially subject to similar unilateral abdications in the future.

Further, we believe it is important to maintain clear delineation of responsibilities between airports, TSA and third party security contractors. Splitting responsibility between airports and TSA can blur the lines of authority of access control and potentially confuse incident response should an access breach occur.

Conclusion

For the reasons stated above, the CAC urges the TSA withdraw this proposal and maintain the current exit lane security structure. This proposal has implications for the overall mission of the TSA and raises questions about the legislative intent of Congress in assigning broad security duties and responsibilities to the TSA following 9/11. We believe the current division of duties results in a clear delineation of responsibilities and best matches a function consistent with the overall mission of the TSA.

We welcome the opportunity to further express our views as may be necessary as you consider the airport industry views in response to this proposal.

Sincerely,


Rod Dinger
President