

| TSA Question | Page # | NBAA Member Response |
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| 1. Comment on weight threshold of aircraft covered by this proposal. | 10 | |
| 2. Comment on the phased approach and on determining which phase would be applicable to each large aircraft operator based on the location of the aircraft or headquarters. | 24 | |
| 3. Comment on whether the Security Threat Assessment (STA) should be transferable so that the flight crew member would need to undergo only one STA every 5 years, regardless of the number of employers the flight crew members may have within the 5-year period. | 26 | |
| 4. Commend and recommended methods for positively identifying pilots and effectively linking them to the aircraft they are operating. | 26 | |
| 5. Comments on the role that watch list service providers may continue to have if the responsibility for watch list matching shifts to the US government in the future. For example, would watch list service providers offer their services to consolidate passenger information from large aircraft operators and to transmit the passenger information to Secure Flight? | 29 | |
| 6. TSA is considering whether to require all individuals to provide their gender and date of birth to assist in the watch list matching and resolution process. | 33 | |
| 7. Comment on whether it should establish a minimum time for submission of passenger information to the service providers, what that minimum time should be, and the reasons supporting the suggested minimum time. | 33 | |
| 8. Comment on whether full program aircraft operators should be permitted to conduct watch list matching for passengers on flights operated under their LASP using the system or process that they | 38 | |

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| use for flights operated under the full security program, including TSA's Secure Flight Program when it is available. | | |
| 9. Comment on how a privacy notice could be provided during the collection of information while considering the feasibility, costs, and effectiveness of providing such notice. | 38 | |
| 10. Comment on whether the proposed record retention for the Secure Flight Program should be applied to large aircraft operators and watch list service providers to ensure that personally identifiable information is not retained longer than necessary. | 39 | |
| 11. TSA is considering requiring large aircraft operators and watch list service providers to retain passenger information for passengers who are cleared, for 3 years, to facilitate the audit that large aircraft operators would undergo every 2 years under proposed 1544.243 and compliance oversight. | 39 | |
| 12. Comments on whether the watch list matching service providers should serve as part of the long term solution to large aircraft watch list matching, such as by gathering the passenger information from the aircraft operators and submitting it to TSA for watch list matching, then receiving the results from TSA. | 41 | |
| 13. Comment on whether maintaining the watch list matching service providers may reduce the costs associated with a transition to the Secure Flight Program. | 42 | |
| 14. Comment on whether to include a system of assigning auditors in the final rule and on methods of doing so. | 43 | |
| 15. Comment on whether it is necessary to require full program aircraft operators that also operate flights under a LASP to contract with a third party auditor to conduct a biennial audit of their | 43 | |

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| operations for compliance with their security program and TSA regulations. | | |
| 16. Comment on large aircraft operators that are not carrying persons or property for compensation or hire – should “weapons” be limited to guns and firearms. | 45 | |
| 16A. Further, should there be a different requirement depending on whether the aircraft has a MTOW of 45,500K or less or more than 45,500 kg? | 45 | |
| 17. Comment on whether there is a more cost effective means of meeting the same or substantially similar security goals of the aircraft operator security coordinator requirement. | 45 | |
| 18. Comments on the use of a single individual for multiple security coordinator roles. | 46 | |
| 19. Comments on whether other types of airports should also be required to adopt a security program, such as the partial program. | 62 | |
| 20. How should TSA determine whether an airport “regularly serves” a large aircraft with MTWO of over 45,500 kg or a pax seat config of 61 seats or more? | 62 | |
| 21. Comments on whether the content requirements of the partial program and the supporting program should be amended. | 63 | |
| 22. Comments on whether auditors with these important duties should be subject to a qualification such as US citizen, US national or lawful permanent resident of the US. | 72 | |
| 23. Comments on auditor qualifications as well as other requirements that TSA should consider for auditors of LASP. | 76 | |
| 24. Comment on whether it should require certain individuals with the aircraft owner company should undergo a STA. | 87 | |
| 25. Comment on whether we should provide additional features of subpart K (Fractionals) in these | 88 | |

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| regulations such as the requirement that the program manager brief the fractional owner. | | |
| 26. Comment on limiting the number of entities that would be approved watch list service providers, including what criteria would be used to determine which applicants would be approved and how many watch list service providers should be approved. | 98 | |
| 27. Comment on whether to require covered personnel (at watch list service provider) to be US citizens, US nationals or lawful permanent residents of the US | 99 | |
| 28. Comments on which standards and controls in the NIST Special Publication 800-53 should apply to watch list service providers systems. | 101 | |
| 29. Comments to evaluate whether the proposed information requirement is necessary for the proper performance of the functions of the agency including whether the information will have practical utility | 130 | |
| 30. Comments to evaluate the accuracy of the agency's estimate of the burden | 130 | |
| 31. comments to enhance the quality, utility and clarity of the information to be collected | 130 | |
| 32. Comments to minimize the burden of the collection of information on those who are to respond, including using appropriate automated, electronic, mechanical or other technological collection techniques or other forms of information technology | 130 | |
| 33. Requests detailed comments to enable quantification of the impact for new and existing operators | 141 | |
| 34. Comment on agency's preliminary conclusions of impact of rule on small businesses | 151 | |
| 35. Comment on the assumption of 0 – 46 small entities in this industry would be impacted by rule | 155 | |

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| 36. Comment on whether TSA may have under or over estimated the number of small entities affected. | 158 | |
| 37. Comment on preliminary determination of whether this would be a significant economic impact on covered aircraft. | 165 | |
| 38. Comments on whether the proposed rule would have a significant economic impact on a substantial number of newly regulated aircraft operators. | 171 | |
| 39. Comments on whether a self assessment tool should be mandatory but has not set it forth as a requirement under the proposed rule. | 172 | |
| 40. Comments on whether it should adopt a self paced training program for affected airports that would reduce the impact of this requirement | 173 | |
| 41. Comment on preliminary conclusion that airport rules would not impose a significant economic impact. | 174 | |
| 42. Comment on whether the proposed rule would have a significant economic impact on the 68-74 publically owned small airport operators that TSA identified in its research. | 175 | |
| 43. Comments on use of TSA inspectors to conduct audits | 176 | |
| 44. Comments on TSA's no determination of significant economic impact on small entities | 182 | |