



**Testimony of Gregory Principato  
President  
Airports Council International-North America**

**before the**

**Senate Committee on Commerce, Science and Transportation  
Subcommittee on Aviation Operations, Safety and Security**

***“International Aviation Screening Standards”***

**December 2, 2010**

Airports Council International-North America  
1775 K Street, NW, Suite 500  
Washington, DC 20006  
(202) 293-8500

Chairman Dorgan, Ranking Member DeMint, and members of the Subcommittee, thank you for the invitation to appear before you today to offer the views of airport operators on airport security and improvements to enhance the current system. As the President of Airports Council International – North America (ACI-NA), I am testifying today on behalf of the local, regional, and state governing bodies that own and operate commercial service airports in the United States and Canada. ACI-NA member airports enplane more than 95 percent of the domestic and virtually all the international airline passenger and cargo traffic in North America. Nearly 400 aviation-related businesses are also members of ACI-NA.

Mister Chairman, we commend you for holding this important hearing. Each day, airports work to ensure the safety and security of our passengers, employees and facilities. To this end, airports partner with airlines, tenants, the Transportation Security Administration (TSA), Customs and Border Protection and Federal, State, and local law enforcement to maintain and develop a comprehensive, layered security system that can quickly adapt and respond to new threats.

### **Christmas Day Bombing Attempt**

In the immediate aftermath of the attempted attack on Christmas Day 2009, TSA imposed additional security requirements on domestic and international airlines with flights to the United States. Some of the measures included restrictions placed upon passenger access to carry-on and service items as well as limitations on the ability to get out of their seats during the last hour of flight. In addition, airlines were required to turn off the moving map displays, co-incidentally the most watched channel on in-flight entertainment systems. The measures also called for passengers boarding flights to the U.S. to be subjected to secondary screening at boarding gates and searches of their carry-on items.

On the day of the event, many airports in the U.S. – including Detroit – learned of the attempted terrorist attack from the media. As the new measures were being implemented, many flights were delayed and passengers endured significant wait times at security checkpoints, especially in Canada. Although TSA coordinated closely with the airlines in the immediate aftermath of the

attempted bombing, it did not coordinate as effectively with airports and the impact of the enhanced passenger screening requirements – particularly at Canadian airports – was significant. In order to reduce wait times at security checkpoints, which had exceeded two hours, Toronto Pearson International Airport had no choice but to work with airlines to cancel 25 percent of their flights to the United States. As a result, ACI-NA worked with its counterparts in Europe and Canada to share information and provide updates on the evolving security measures.

It is important to understand that the TSA mandates requiring airlines to provide enhanced security and screening of passengers on flights departing international airports for the U.S. could not be implemented absent coordination with the airport operators and foreign governments. European airports are largely responsible for screening passengers and baggage, paying for new screening technology and, after ensuring that the requirements could be conducted in accordance with local regulations, had to hire and deploy security staff to gates to conduct enhanced passenger screening on flights departing to the U.S. Absent the necessary funding and manpower at many airports to perform the new requirements and in an attempt to develop sustainable measures that provided an adequate level of security while minimizing passenger and flight delays, TSA worked closely with airlines, and ultimately dispatched teams of senior executives to meet with foreign governments and airports. As a result of the coordination, TSA modified the measures in order to use data to target certain passengers for additional screening, thus enhancing security while minimizing the burden on airports.

Although Department of Homeland Security (DHS) Secretary Janet Napolitano had several meetings with airline representatives and their associations after the Christmas Day bombing attempt, there was little coordination or information sharing between DHS and the airport industry. To ensure DHS understood the important role airports throughout the world play in aviation security, ACI-NA pressed for a meeting with the Secretary. ACI-NA offered to assist the Secretary in identifying sustainable aviation security measures through the International Civil Aviation Organization (ICAO), given that Airports Council International (ACI World) serves as the officially accredited airport representative to ICAO. Since that time, DHS and TSA have worked extensively with foreign governments and through ICAO to strengthen aviation security

standards and encourage the use of the latest screening technology. As a result of these efforts, ICAO recently issued a Declaration on Aviation Security which recognizes the need to strengthen aviation security world-wide through the uniform application of aviation security standards and available screening technologies while putting a priority on the research and development of explosive detection technology.

In furtherance of our objective to coordinate on aviation security, ACI-NA invited TSA Administrator John Pistole, Daniel Calleja, Director of Air Transport for the European Commission and Kevin McGarr, President and CEO of the Canadian Air Transport Security Authority, to a joint board of directors meeting of the North American and European regions of Airports Council International (ACI-NA and ACI Europe) this past September. In addition to discussing the need for coordination between governments and industry to develop sustainable aviation security measures, the boards expressed concern that the EU has unrealistic deadlines for loosening the restrictions on Liquids, Gels and Aerosols, which cannot be met and are out of sync with similar initiatives in the U.S.

To continue our effort to educate our member airports on international aviation security measures, I am leading a delegation of airport directors and security staff on a mission to Israel this month which will allow participants to hear presentations from Ben-Gurion Airport security professionals and to learn first-hand the procedures the Israeli's use to keep their passengers and facilities secure. In addition to encouraging all of our member airports to participate in our 4<sup>th</sup> annual mission, we also invited senior TSA representatives to join us.

### **Advanced Imaging Technology**

In the wake of the attempted terrorist attack on Northwest Airlines Flight 253 on Christmas Day, TSA announced its plan to install advanced imaging technology (AIT) at security checkpoints to replace current walk-through metal detection devices. AIT units had been tested at several airports in the United States over the last several years; and unlike the metal detection devices AIT units can detect prohibited items with little or no metallic content.

ACI-NA generally supports the TSA's continued evaluation, testing and deployment of this technology. In doing so, however, we identified three key considerations:

1. Throughput – the deployment of AIT technology at airports should not result in increased wait times;
2. Space – in accordance with the old adage “when you have seen one airport, you have seen one airport,” AIT technology may not fit at every checkpoint absent significant and costly facility modifications, the cost of which should be borne by TSA;
3. Privacy – the TSA continues to adhere to the strict privacy principles it put in place when the technology was originally pilot tested:
  - Images cannot be stored, downloaded or copied;
  - Operators are stationed in separate rooms with no view of the individual being screened;
  - Passengers are given the option of going through a walk through metal detector and being subjected to a pat down inspection.

Additionally, ACI-NA has encouraged TSA to pursue enhancements to AIT technology that will increase effectiveness, efficiency and passenger throughput while continuing to provide passengers the option of alternate screening methods. TSA's proposed solution is Automated Target Recognition (ATR), an algorithm that can be loaded on AIT units and readily identifies items of concern for TSOs by highlighting certain areas on a stick figure image for further inspection. Since ATR produces only a stick figure image, it not only addresses concerns about privacy, but it also negates the need for the image operators to be located in separate, isolated viewing rooms, thereby reducing the space needed at airport security checkpoints. Even with these advancements, airports continue to have concerns about the larger footprint of this technology, which takes more space than walk-through metal detectors and could necessitate costly facility modifications in order to accommodate the units. Of the airports that responded to

a survey conducted by ACI-NA, about half reported having limited checkpoint space. ACI-NA raised these issues at a meeting with DHS Secretary Napolitano in February.

In response to the concerns raised by airports, Secretary Napolitano asked TSA to constitute a working group comprised of airport and TSA representatives to develop a coordinated plan for AIT deployment that considers passenger throughput and the costs associated with facility modifications. Although TSA, at a working group meeting, confirmed that it plans to deploy the first 500 AIT units only to airports that have available checkpoint space and do not need facility modifications, the costs associated with facility modifications is something that should be borne by TSA and is especially challenging for smaller airports. TSA has now deployed over 385 units to more than 68 airports and is on track to reach its goal of deploying a total of 500 AIT units in the remainder of 2010.

So far, the working group has facilitated a collaborative approach that will allow TSA and airports to resolve the identified challenges and result in coordinated deployment of AIT at checkpoint locations where the technology can be readily accommodated. Given the lack of available funding necessary for facility modifications at checkpoint locations where space is limited, airports remain optimistic that the working group process will result in a cooperatively developed deployment plan that identifies airport checkpoint locations where AIT can be readily deployed. ACI-NA continues to work with TSA to ensure it coordinates all security technology deployments with airports, as TSA plans to have a total of 1000 AIT units installed at airports across the country by the end of 2011.

TSA recently invited ACI-NA to participate in an International Policy Summit on AIT to better educate representatives from other countries, answer questions and discuss the security benefits of the technology. The forum also provided an opportunity for foreign government representatives to present on their experiences in using the technology, including the use of ATR, which is installed and operational on all AIT units at Schiphol Airport in Amsterdam.

## **Enhanced Pat Down Procedures**

Along with installing AIT units, TSA has also implemented enhanced pat down procedures. According to TSA, only individuals who trigger an alarm during screening, or those who opt out of screening by AIT would be subject to these new pat down procedures. In advance of the implementation of these enhanced pat downs, ACI-NA strongly encouraged TSA to conduct a public awareness campaign to educate travelers on the rationale and necessity for the new procedures. Unfortunately, the public awareness campaign was only launched after significant public backlash over the enhanced pat down procedures.

Concerns of passengers must be taken seriously, and we need to find the delicate balance between providing the appropriate level of security while ensuring efficient checkpoint screening and airport operations. This continues to be a substantial challenge. A system that achieves a balance between optimal security and customer service is achievable, provided that government and industry work together. ACI-NA stands ready to work with DHS, TSA and Congress to reach this goal and hosted a meeting on December 1 with the heads of airport and airline associations to discuss the principles of a future aviation security system that achieves that delicate balance.

## **Technology**

While there have been significant advances in the research and development of cutting edge passenger and baggage screening technologies, a cohesive screening technology research and development plan that leverages government and industry expertise has yet to be formulated. Similarly, adequate funding and prioritization is essential to ensure that new technology is deployed to airports where outdated technology is in need of replacement. With the significant focus on screening passengers and baggage, the development of next generation screening technology, as well as that for screening air cargo, has suffered and should also be a priority. The research and development of next generation security technologies could be further advanced through the introduction of government-administered grant programs that provide incentives to manufacturers.

We routinely encourage TSA and the European Union to collaboratively develop mutually recognized standards for security screening technology. The identification of mutually recognized standards will allow manufacturers to develop screening technologies that can be used in different countries while stimulating competition between manufacturers, and resulting in technology enhancements and lower costs. Further, the deployment of screening technology developed in accordance with the standards will allow passengers, baggage and cargo to be screened once, thus paving the way for true harmonization, something that is essential to further enhance the efficiency and effectiveness of the security process, especially as we prepare for the anticipated increase in the number of passengers in the coming years.

One area that technology development and inter-governmental coordination could readily address is the current process of re-screening connecting baggage from Canada at U.S. gateway airports. This requirement is redundant and unnecessarily drains limited TSA and industry resources as the checked baggage has been inspected by CBP officials, is screened prior to departing Canada, and has flown at least one segment upon arrival in the U.S. TSA should work with the Canadian authorities to develop mutually agreeable checked-baggage screening procedures or technologies at Canadian airports, which would eliminate the need for re-screening at U.S. locations. This would not only free up limited TSA resources but also reduce the operational burden on airports, decrease flight delays and minimize misconnecting checked baggage.

Although biometric employee identification and access control offers some potential security benefits, implementation is very costly and should not be the result of an unfunded federal mandate. Given the significant cost to outfit an airport with biometrics, and in accordance with sound risk-management, an investment of this magnitude in this type of evolving technology, something that would further deplete limited resources, must be weighed against the security benefits of other systems. While a few airports have begun to test and install biometrics in accordance with existing TSA technology standards, a federally-funded pilot program is necessary to evaluate the capabilities of biometric employee identification and access control.



Subsequent to a pilot test, results must be scrutinized to determine which systems should be included on a government-developed qualified products list. In consideration of the limited availability of resources, funding must be provided to airports for the installation of biometric employee identification and access control systems.

### **Intelligence Information and Sharing**

The importance of timely and actionable intelligence information cannot be understated and is essential for TSA and airports to appropriately adjust the aviation security posture. While information sharing has expanded, more can and should be done. Of concern to ACI-NA is the timeliness of actionable intelligence information which is used by airports to immediately develop countermeasures to respond to the identified threat. Proactive security professionals realize the importance of preparedness; information outlining threats to airports can be used to help reduce identified risks.

The government should undertake an effort to conduct a risk-based analysis of all threats. Once this has been completed, each should be prioritized, based on the latest intelligence information and the relative risk, taking into consideration the effectiveness of measures already in place. The development of a threat matrix will permit government officials and airport security professionals to mutually identify areas that necessitate additional security measures and importantly, provide a methodology for the most effective allocation of limited resources.

An example of the critical importance of intelligence information is the recent attempted bombing of cargo airplanes. This plot was disrupted because TSA readily conveyed actionable intelligence information to the all-cargo airlines.

### **Sustainable Aviation Security Measures**

One of the key challenges for airports is TSA's use of Security Directives to promulgate regulations. In most cases, procedures mandated through Security Directive must be

implemented immediately, with little consideration for the fact that each airport is different and boiler plate measures may not work, given facility constraints and more importantly, limited resources. Although TSA has changed its posture somewhat, to allow the opportunity for a coordinated review of some Security Directives prior to issuance, others have been issued recently absent industry input.

While airports agree that TSA needs the ability to avoid the formal rulemaking process and issue Security Directives, that regulatory option *should be strictly reserved for situations involving an immediate threat*, as was stipulated by Congress and in TSA security regulations. Rather than routinely regulating through Security Directive, TSA should use the Notice of Proposed Rulemaking (NPRM), a proposed change to airport security programs or a similar coordinated rulemaking process, which affords industry an opportunity to identify other procedures that provide the same level of security while minimizing unintended costs and operational impacts. Although TSA ultimately issued Security Directives in response to the liquids explosives plot in August 2006, it was only after extensive coordination and collaboration with industry to review the intelligence information that sustainable measures were developed. By working together, government and industry transformed the aviation security system overnight maintaining security but also taking into account the needs of the traveling public.

Although there has been much discussion about the need to conduct an “Orange Level Review,” to evaluate the heightened security requirements that the aviation industry had to put in place and comply with since August 2006, some in government and industry are loath to rescind measures – even when doing so means that limited resources can be freed up to bolster other areas – out of concern that it might be perceived as weakening security. In reality, many aviation security measures are out-of-date, contradictory and require the application of staff and funding to areas that have long since been addressed by technology or other security layers.

As a proactive measure and in consideration of the significant security costs borne by airports, ACI-NA constituted an In-Depth Security Review task force, comprised of staff and several

airport representatives, to conduct a thorough review of current security measures. In conducting the review, ACI-NA evaluated all existing security requirements to identify those which are duplicative, stale or no longer make sense given the evolution of the threat and/or implementation of countermeasures. In order to ensure a coordinated approach, ACI-NA involved American Association of Airport Executives and TSA representatives in the process and is working to ensure the near-term modification of existing requirements to provide additional flexibility for airports through the development of sustainable security measures. Recently, as a result of this process, TSA eliminated a long-standing requirement for employment history verifications, something that was no longer necessary when airports began conducting fingerprint-based criminal history records checks on all employees in 2006.

### **Conclusion**

Although there are aspects of the current aviation security system that are effective, there are others which need to evolve to keep pace with the projected increase in the number of passengers and volume of cargo in the United States and abroad. Only through an effective partnership where government coordinates with industry to apply appropriate security measures can we ensure the long-term sustainability of the aviation system.

Through an effort in which government works to prioritize threats, adjusts the security posture based upon credible intelligence information and allocates resources accordingly, while at the same time, collaborating with the airport industry to mutually address security issues, we can better achieve our mutual goal of enhancing security while minimizing unnecessary operational impacts.

Thank you for the opportunity to appear before you today.