

PUBLIC PRESENTATION  
TO THE  
U.S. TRANSPORTATION SECURITY ADMINISTRATION  
CONCERNING  
NOTICE OF PROPOSED RULEMAKING  
TSA-2008-0021

HOUSTON, TEXAS

JANUARY 28, 2009



**Planehook Aviation Services, LLC**

*Securing aviation one airport at a time*

(for Internet distribution)

## **Disclaimer**

This document is intended to record remarks presented in public on behalf of Planehook Aviation Services, LLC to the U.S. Transportation Security Administration. We have attempted in good faith to make best use of resources publicly available or within our possession. Any misinterpretation of information or misquotation of data is an error on our part and unintentional.

Respectfully,

David C. Hook, PSP  
President  
Planehook Aviation Services, LLC

Oral Statement:

Members of the TSA, distinguished guests, ladies and gentlemen, I am David Hook, President of Planehook Aviation Services headquartered near the Alamo. I am certified as an Airport Security Coordinator, Physical Security Professional, Airline Transport Pilot, and Flight Instructor. I also recently retired from U.S. Air Force Special Operations as an Air Commando A-Team Leader in the War on Terror. For the past 5 years my company has provided security consulting services to our General Aviation Community.

As time is limited, I'll be brief.

First, the NPRM makes references and inferences to risk and how the proposed changes would mitigate public risk to terrorist attack. However, two of the three elements which define risk are missing. Neither a threat analysis nor a vulnerability assessment is offered. The only evidence to attempt to justify the proposed programs is a break-even consequence analysis. This in and of itself is insufficient evidence to validate the existence of a risk and justify mitigation measures.

Second, Planehook disagrees with the sweeping generality that all designated reliever airports are suitable for regular service to large aircraft. Planehook performed an analysis of the reliever airports listed in the National Plan of Integrated Airport Systems. We sampled 215 non-Part 139 reliever airports. We used the takeoff performance of a representative aircraft commonly used in general aviation and having a maximum certified takeoff weight of 12,500 pounds in

order to determine a minimum value for runway length. Using the average field elevation for the sampled airports of 656 feet MSL and the national average Outside Air Temperature of 54.9 degrees Fahrenheit (and standard pressure), our model aircraft requires 5,200 feet of useable runway for a normal takeoff. Further, using the national average summer temperature of 72 degrees, this aircraft requires 5,400 feet. Therefore, in our analysis we conservatively concluded that runways of 5,000 feet or less are generally not sufficiently long to support large aircraft. Applying this value to the entire population of reliever airports, we found that over 42% of reliever airports lack sufficient runway length, weight bearing capability, or turbine fuel availability commonly used to support large aircraft

Third, we find that the economic analyses that presume an existing airport or flight department employee is sufficiently undertasked as to allow them to absorb as an additional duty the responsibilities of a security coordinator is unrealistic. If based solely upon the requirement for security coordinators to attend annual refresher training, a minimum of two security coordinators is required, with security industry standards being 4 to 5 for a single 24/7 position.

As a parting thought, let me say that in a democracy rules and regulations are instituted at the consent of the governed.

Thank you for the opportunity to present this information.