

November 22, 2011

The Honorable Janet Napolitano  
Secretary  
U.S. Department of Homeland Security  
Washington, DC 20528

Dear Secretary Napolitano:

We the undersigned companies and associations are writing to express our concern with the lack of progress on the Transportation Security Administration's (TSA) rulemaking regarding repair station security.

This rulemaking is the direct result of congressional mandates contained within the 2003 *Vision 100 – Century of Aviation Reauthorization Act*, and the 2007 *Implementing the Recommendations of the 9/11 Commission Act*. The former act required TSA to issue “final regulations to ensure the security of foreign and domestic aircraft repair stations” within 240 days while the latter act specifically prohibits the FAA from certifying any new non-domestic repair stations after August of 2008 if the TSA had not yet promulgated the required regulations.

TSA first held a public meeting on this rulemaking in 2004 and issued a Notice of Proposed Rulemaking (NPRM) five years later in November of 2009. The aviation industry provided TSA with comprehensive comments on the nature and diversity of repair station operations and how to make this rule an effective, risk-based security regulation. The public comment period for this NPRM closed in February of 2010 and work on a final rule has been ongoing for the past 21 months.

The United States has long been the world leader in aviation and American aircraft and parts remain one of our key exports with aerospace contributing positively to our nation's balance of trade. The extensive delay in promulgation of a final rule regarding repair station security has a negative impact on our industry and the U.S. economy. American companies seeking to expand their markets overseas are hindered relative to foreign competitors due to the inability to get new repair stations certified.

We respectfully request that your department work with TSA and others in the federal government to finalize the rulemaking by Dec. 31, 2011. The publication of a final rule will enhance security and also remove a regulatory roadblock that is currently damaging American companies. We urge your department to move quickly on this rule.



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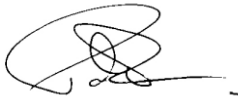
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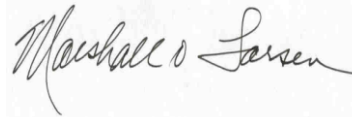
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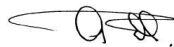
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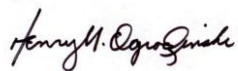
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