

## Securing Air Cargo

The “Implementing Recommendations of the 9/11 Commission Act of 2007” required the TSA to screen 100 percent of cargo transported on *passenger* aircraft by August 2010 by means of a level of security that is “commensurate with the level of security for the screening of passenger checked baggage.”

According to a recent TSA-issued Interim Final Rule (IFR) establishing the Certified Cargo Screening Program (CCSP), an airline employee who handles cargo at an airport must undergo a fingerprint-based criminal history record check (CHRC) and a name-based security threat assessment (STA), but an individual with unescorted access to the same cargo off-airport need only be vetted by the STA. All individuals with unescorted access privileges to air-cargo should be vetted according to the same standard, a fingerprint-based CHRC accompanied by an STA.

The IFR prescribes the role played by non-governmental entities in the Certified Cargo Screening Facility (CCSF) system, a key component of the CCSP. The CCSF program relies primarily upon TSA-approved third-party validation firms and other organizations which certify the validators. The reliance on third party entities presents specific problems for TSA in terms of its duty to ensure the integrity of the system and in avoiding conflicts of interest. The validation of a private sector organization’s security program is a role that should be filled by direct government employees. Congress must provide TSA with sufficient resources to ensure that its cargo security program is sound.

In spite of the many aviation security improvements that have been made since the events of 9/11, one level of security does not yet exist between the passenger and all-cargo domains. TSA has stated that the potential for an aircraft takeover poses the highest security threat to all-cargo operations, yet the all-cargo sector is not afforded basic protections that are afforded passenger operations.

ALPA offers the following recommendations for improving all-cargo security:

- Install hardened flight deck doors or a suitable alternative on all-cargo airliners.
- All persons with unescorted access to cargo destined for shipment on all-cargo airliners must be vetted by a fingerprint-based CHRC and STA.
- Implement Secure Identification Display Area (SIDA) requirements for all-cargo air operations areas.
- Subject persons transported on all-cargo airliners to an STA.
- Mandate *Common Strategy* security training for all-cargo flight crew members.
- Implement a risk-based, Freight Assessment System for cargo shipped on all-cargo aircraft.
- Make greater use of screening technology in the all-cargo domain.