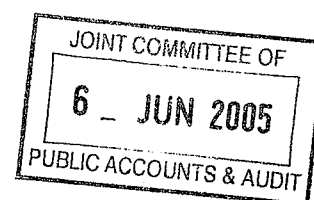


Submission No. 2

Sent: Monday, 6 June 2005 3:18 PM
To: Committee, JCPAA (REPS)
Subject: SUBMISSION TO FOLLOW UP ON REPORT 400



I wish to submit the attached letter of 26 April ("minsecure") written to the Minister and yet unanswered, together with comment in the email below, as input to Reference Points "a" and "g" of the Terms of reference.

I also relate my comments to those published in the Australian Newspaper about evidence given by Andrew Tongue.

I acknowledge that media reports may lack credibility but believe this case does represent his comments to the JCPA.

"The senior public service chief in charge of security at airports, Andrew Tongue, revealed the security weakness in Senate estimates hearings two weeks ago.

Mr Tongue, executive director of the Office of Transport Security, also told the hearings added criminal history checks on airport staff, which are now on the agenda, might shut down the nation's aviation industry.

"If there was a change in threat level we would not have many places left to go other than saying: 'Let's shut the system down!'"

When asked if it would be possible to borrow or steal someone's Aviation Security Identification Card, Mr Tongue replied: "Yes."

"If they knew what it was and they knew what access rights it had," he said. "You would have to know the gate at which the access was available."

He added that fences surrounding airports were not considered adequate security."

My submission is that the current actions proposed for access by non-RPT GA pilots to airports will actually increase the potential for ASIC loss, theft, or misuse, and that the technology exists to provide a cheap solution that strengthens aviation security.

I note that the original ASIC list of airports requiring security was very small as it involved the major domestic/international locations.

The list of security control airports at 15 March 2005 is around 150 some of which may have one only if any RPT flight per day.

It includes such thriving terrorist threat areas as Birdsville, Qld, Mount Hotham, Vic, Ceduna, SA, Flinders Is, Tas, Maningrida, NT, Halls Creek, WA, and Lightning Ridge, NSW.

The proposal to issue all non-RPT pilots with ASIC to enable their entry to security control airports prostitutes the intent of the ASIC card which was designed for employee identification. Pilots now require a photographic licence with the SAME security checks as an ASIC card. Why not use the photo licence as a GA ASIC for entry to the GA apron at the security control airports?

For detailed explanation, I refer the Committee to the attachment, particularly the second last para P1 and first para P2, and my closing points 1 and 2.

The issue of unnecessary ASIC seems a consequence of two organizations – CASA and DOTARS – with different charters. I submit to the JCPA that the use of the AVID instead of ASIC for GA pilot access to GA aprons reduces the risk of lost or stolen ASIC cards and the potential for misuse for terrorist or criminal activity.

Brian Hannan

6 June 2005

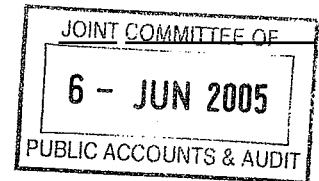
6/06/2005

Brian Hannan

June 6, 2005

Hon John Anderson MP, Minister for Transport and Regional Services

(via Jason Wood MP, Member for Latrobe)



Minister

General Aviation – Security and Sustainability

I write to express concern at the impact on the GA sector of the current security methodology for GA pilots and most importantly the heightened security risk actually created by that methodology.

I relate this letter particularly to the lower level of GA – the private (non-RPT) area, usually in six (or less) seater aircraft, used for pleasure and travel. That travel is of benefit to your constituents in your Regional Services role, as pilots and passengers are tourism contributors to the areas to which they fly.

Under the proposed arrangements, GA pilots will require two identifiers – a photographic pilot licence or aviation identity, which I refer to as an AVID, and - to access the GA part of the increasing number of “secure” airport locations used by RPT - an Aviation Security Identification Card or ASIC.

The reason for pilots to access secure airport GA locations is to arrive and depart their aircraft, to obtain fuel for that aircraft, or to use food or toilet facilities in terminal buildings. Provided the fuel bowser is not within a “secure” location visiting pilots have no need to enter secure areas. Interestingly, the airport may only have one RPT flight per day with only a half-hour secure “window” needed either side.

The AVID is issued by CASA and the ASIC by DoTARS. Identical security checks are conducted to issue either. Because of the stringent security checking of existing and new pilots, it is axiomatic that such pilots pose no threat to aviation therefore their only need is to identify themselves as compliant.

The ASIC is a card type identifier, easily worn and visible. I doubt the AVID is fully ICAO compliant - it should be altered to a card type identifier (similar to the ASIC or a drivers licence) so it can be easily worn and visible. The only possible benefit of the existing AVID in its booklet form is as upper body armour, provided one can find a shirt manufacturer who makes pockets large and strong enough. Why issue a photographic licence that cannot be worn – this is a contra-security action as visibility and security are related. By making the AVID the suggested wearable identifier, CASA would better support the Australian Aviation security program. This aspect mandates your investigation.

If the proposed dual card identification program proceeds, the ASIC card will be issued to most pilots who go touring, rather than the necessary group – those pilots who fly RPT and do require regular entry to secure airport areas. A cornerstone of security is to limit the issue of identifiers such as the ASIC as the greater the issue rate the higher the probability of loss, theft, and misuse. Excess issue also ties up security resource on work related to bureaucratic effort rather than the essential role of vigilance.

Report 400 “Review of Aviation Security in Australia” of June 2004 made recommendations including the issuing of ASIC to staff working at airports servicing passenger and freight aircraft, the extension of the ASIC checking process to all pilots and trainee pilots, and anti-theft measures for GA aircraft. The first and last are being implemented, and the middle concept is being achieved by the AVID process but somehow has been misunderstood as the requirement also for an ASIC.

More importantly, the Report notes that an audit at Melbourne found 15 to 16% of expired ASIC cards were not returned and, worse, between 1 and 2% for active ASIC. I argue that increasing the issue of ASIC cards – particularly to those without a genuine work related need for ASIC – is contrary to commonsense national security action.

One item missing entirely from the security equation is the matter of the other occupants of a GA aircraft wishing to arrive or depart a secure airport. Any who are pilots will have an AVID or ASIC or both under the current proposals, however, the remainder are “unidentified” under the current security regime. Except during the half-hour window either side of an RPT arrival or departure, when “VIS” passes may be obtainable, the reality is that there is no suitable security process to handle these people under the guidelines. I cannot speak for AOPA but suggest that AOPA would be well positioned to assist DoTARS in examining the practical aspects of this item.

Turning now to GA as a part of the Australian economy, the lower level is not thriving. There are alternative less expensive and less regulated sports and hobbies, the GA fleet is ageing and looking tired to prospective pilots, and the emergence of the new generation RAA aircraft also provides a cost effective entry point for social and pleasure flying.

The costs and effort associated with the new AVID process will deter many GA licence renewals for those who do little flying per annum. If we add to this the effort and cost to obtain a duplicate identity – the ASIC – the deterrent increases. Certainly the lower level of GA is not a major part of the Australian economy, however, why curtail its contribution unnecessarily.

The solution to the AVID / ASIC matter is complicated because it cuts across two Government authorities – and only you are in a position to issue an advice to resolve the inter-departmental issues.

To sum up my suggestion, remembering that the security checks for AVID and ASIC are identical: -

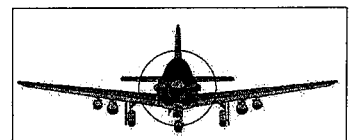
1. CASA should make the AVID a card type photographic licence suitable for wearing as identification. This needs to be done NOW as only since middle March has the issuing of the fully security checked AVID commenced therefore the process needs to be changed ASAP to save re-issue cost and angst.
2. DoTARS should accept that the AVID entitles the wearer to pursue the normal access functions, and fuelling of GA aircraft, being operated by the AVID wearer.

I request your consideration of the above proposals in the best interests of the economy and national security.

Sincerely

Signed electronically Brian Hannan

CC Editor, AOPA Magazine, Andrew Kerans, Aviation Forums



*It's what you learn after you
know it all that counts*