

*100% Air Cargo Screening:
Remaining Steps to Secure Passenger Aircraft*



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before the
Subcommittee on Transportation Security
and Infrastructure Protection
of the
House Committee on Homeland Security

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AIR TRANSPORT ASSOCIATION

On behalf of the Air Transport Association member airlines, we appreciate the opportunity to brief the Committee on our progress in achieving 100 percent screening of cargo transported on passenger-carrying aircraft by August 2010. The airlines are committed to do their part in meeting that requirement of the *9/11 Commission Recommendations Act*, and to work cooperatively with the Transportation Security Administration (TSA) in doing so. We would like to commend the Committee for its leadership and support in meeting this goal and to recognize, in particular, the important contributions made by Ed Kelly at the Transportation Security Agency, who we all greatly miss.

I am pleased to report that the airline industry fulfilled interim requirements that 50 percent of such cargo be screened by February 2009 and 75 percent by May 1 of this year. This impressive achievement reflects hard work; this was not an easy task. That experience taught us an important lesson: Achieving the 100 percent level will require the continued close collaboration of the airlines, TSA, freight forwarders and shippers, both in the United States and overseas.

The biggest challenge in meeting the August 2010 deadline continues to be the lack of certified screening technology to inspect large air-cargo pallets. Most pieces of cargo transported on wide-body aircraft are consolidated into large shipments, and 75 percent of cargo is transported on wide-body aircraft. That fact gives you an idea of the magnitude of the challenge that we face.

Shippers and freight forwarders typically create these pallet-size shipments before they are tendered to an airline. The challenge has always been that screening is required at the individual carton level. Existing technology cannot screen large consolidated shipments. The nature of our business and available screening equipment continue to be badly mismatched. We identified this challenge when we testified before this subcommittee last March, and the situation remains unchanged. While the Certified Cargo Shipper Program (CCSP) is helping to address this problem, by implementing screening-protection upstream, a far more practical solution remains to be found with the eventual TSA certification of screening technology that is compatible with the cargo that we carry.

Breaking down consolidated shipments at an airport cargo facility is not practical. Shipment size, time constraints and facility limitations are the main difficulties. Dismantling an air-cargo pallet or unloading a container and screening each piece would result in the significant disruption of air commerce. Airport cargo facilities and ramps were not designed to be high-volume disassembly and reassembly locations, and are not big enough to perform that role, especially at peak times. A better alternative must be found.

Particularly in light of recent changes to TSA regulations relating to the handling of inbound international air cargo, work is ongoing with the TSA to identify practical measures to both assure security and facilitate important cargo flows. We believe that through the combined efforts of industry and government, a practical solution will be in place before the upcoming deadline.

Going forward, however, the most practical approach internationally rests with the approval, at the government-to-government level, of compatible security programs. TSA indicates that it will pursue recognizing the screening regimes of additional host countries beyond the countries with previously approved programs. We enthusiastically support this effort. Success will eliminate what today often results in the duplicative screening of air cargo by security personnel at the foreign airport and/or the locally authorized freight forwarder, as well as by the air carrier. While TSA anticipates a three-year approval process, we would respectfully urge an initiative to reduce this time frame by at least one-half, with a prioritized effort to move our major trading partner countries to the head of the approval queue.

We have long been on record in support of the CCSP as an indispensable tool in meeting the August 2010 deadline. We have repeatedly noted that if enough shippers and forwarders are not certified, attaining that deadline will be at risk. The Department of Homeland Security is to be complimented for its high-tempo implementation of the CCSP. Its performance has been admirable but, despite best efforts, the number of U.S. shippers certified to date is not as robust as we had hoped. Again, just as the airlines are accelerating compliance plans to meet the August deadline, we would hope to see a companion government effort to address the remaining key challenges as follow:

1. Although TSA has dramatically increased the number of Certified Cargo Screening Facilities among freight forwarders and other TSA-certified Indirect Air Carriers, the certification of key large shippers and manufacturers has not been as successful. We are concerned that in some regions and at some airports, some shippers may experience delays after August, and request attention to these key shippers.
2. Although we recommended last year that TSA expand as swiftly as possible the use of TSA-certified explosive-detection canines to screen large air-cargo consolidations, and the Department directed additional funding to the TSA proprietary canine cargo-screening program, little real change has yet to occur. We continue to believe that canines offer a very valuable tool to help meet the August deadline, and would hope to see a significant application of existing and future TSA resources in this area. We appreciate the Committee's authorization of additional canine teams and hope to see government action soon to get more "paws on the ground" to assist in this important work.
3. As noted previously, a major push to approve compatible host-country security programs remains critically important.
4. And finally, as we all recognize, the best solution remains in the development and certification of efficient screening technologies for large palletized and containerized cargo.

The airlines recognize that the August 1, 2010 deadline means that only complying shipments will be transported after that date. We are committed to meeting that deadline but also to meeting the needs of the domestic and world economies for reliable air-cargo service. These goals must both be met, and we look forward to a continuing cooperative effort with the government to see that they are accomplished.