



**AIR TRANSPORT ASSOCIATION OF CANADA
ASSOCIATION DU TRANSPORT AÉRIEN DU CANADA**

255 ALBERT STREET, SUITE 1100, OTTAWA, ONTARIO K1P 6A9
255, RUE ALBERT, PIÈCE 1100, OTTAWA (ONTARIO) K1P 6A9

TEL:/TÉL: (613) 233-7727
FAX: (613) 230-8648

WEB: <http://www.atac.ca>
EMAIL: atac@atac.ca

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CATSA Act Review Secretariat
Transport Canada
180 Elgin Street
Ottawa, Ontario
K2P 2K3

**Attn: Mr. Tim Meisner
Executive Director**

Dear Tim,

The Air Transport Association of Canada (ATAC) represents approximately 275 members engaged in commercial air transport in Canada. ATAC welcomes the mandated Canadian Air Transport Security Authority Program Review and, accordingly, has the following comments:

1. Corporate Governance Issues

- a) ATAC believes that the Board of Directors should be composed of representatives from the three chief stakeholders with respect to aviation security, namely: Air Carriers, Airports and the Government of Canada.
- b) ATAC advocates that CATSA receive the full government receipts of the Air Travellers Security Charge. Currently CATSA receives a fixed contribution from the Government of Canada. This does not allow for flexibility if passenger loads exceed or fall below the estimate used in calculating the contribution.
- c) ATAC believes that CATSA's Board should be empowered with real financial decision making including budgeting and debt powers. CATSA should have the powers to incur debt and decide upon how to structure asset acquisitions, for example the possibility of a lease arrangement for the hold baggage screening system was not available to CATSA. They should also be granted the authority to receive other monies from users for non-traditional functions, as may be required.

- d) ATAC believes that CATSA should concentrate on aviation security. Any move to expand CATSA's mandate would reduce CATSA's focus on passenger security. It also would introduce a cross subsidization of other activities by passengers.

2. Passenger Screening Issues

- a) ATAC believes that CATSA should practice smart screening by developing a registered traveller program and by utilizing advance passenger information. A passenger that is known to the Authority and has a security clearance poses a smaller threat to civil aviation than one whom the Authority does not know. Proof of Identity should be by biometric identifiers.
- b) ATAC believes flight crew should not be screened. Flight crew by virtue of their positions are in a unique position to interfere with civil aviation without any prohibited items. A thorough up-to-date clearance could alleviate any risks posed.
- c) CATSA should research emerging threats (i.e. TATP and body explosives). The use of triacetone triperoxide (TATP) by terrorists (London, shoe bomber) and body explosives (black widow in Russia) point to a need to research new threats and develop responses to them.

3. Policing

- a) CATSA's contribution for PBS policing should go to Class I Airports only. ATAC believes that any substantive threat to airports is to Class I Airports. Any scheme to flow policing resources to Class II Airports is simply "pork barrelling".
- b) CATSA should assist airports in enhancing policing and perimeter security. ATAC believes that in view of terrorist attacks on airports themselves (i.e. LOT, Rome, Vienna and Colombo), CATSA should support enhanced, conspicuous policing and perimeter security.

4. Armed Police Officers on Board

- a) CATSA should continue support of armed police officers on board but better communication between crew and APOs must occur. Currently the level of communication between flight and cabin crew and APOs is inadequate, and ultimately dangerous. Better training of APOs' expectations for crew members is required.

5. Restricted Area Identification Card

Deployment of the new RAIC should continue but CATSA should look to making it compatible with the new U.S. card. The U.S. is set to introduce a Transportation Worker Identification Credential (TWIC). Harmonization and mutual recognition of the two cards would be beneficial. Extension of the RAIC to other restricted area users (e.g. general aviation pilots) should be considered.

6. National Security

In spite of our recommendations in 1(b) above, ATAC believes that aviation security is a national security issue and accordingly should be funded by the Government in the same manner as the DND is funded.

We thank you for this opportunity to comment on CATSA and the future of aviation security in Canada.

Sincerely yours,



J. Clifford Mackay
President & Chief Executive Officer