



October 30, 2008

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

**Re: Docket No. TSA-2008-0021 Large Aircraft Security Program, Other Aircraft Operator Security Program, and Airport Operator Security Program - NPRM**  
*Request for Comments Period Extension*

To whom it may concern:

EAA (Experimental Aircraft Association) is the world leader in recreational aviation. With an international membership of 160,000 people in more than 112 nations, EAA brings together aviation enthusiasts, pilots and aircraft owners who are dedicated to the continued growth of aviation, the preservation of its history and a commitment to aviation's future.

EAA requests that the public comment period for this NPRM be extended to March 31, 2009 and that TSA conduct a series of public hearings to determine the applicability and impact on owners and operators of personal and recreational aircraft.

EAA maintains that this proposal would create a major shift in the role of the Federal Government regarding the freedom of movement for private U.S. citizens. It would, for the first time, require governmental review and authority before a person could operate their own personal transportation conveyance. This significant intrusion into the lives of ordinary citizens and vast expansion of governmental authority must not be entered into lightly. It should only be contemplated after careful and thorough discussion and review by not only the general aviation community, but by the American public. The rule appears to set significant precedents for the role government plays in the privacy of private citizens. EAA maintains that such a significant shift that allows the government to review and approve the explicit rights of its citizens to assemble and the implicit right to their freedom of movement pose potentially substantial Constitutional rights issues and significant cost burdens on the affected community.

This extension and call for public hearings is being requested for the following reasons:

1. To allow industry groups, such as EAA, sufficient time to notify their members and the general public that this Notice of Proposed Rulemaking has been issued and provides important information about its content and impact.

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2. To allow the public to conduct a thorough review, allowing TSA to receive more in-depth comments to this very important NPRM.
3. To allow a legal review of the associated Constitutional issues and privacy-related matters in regards to the increased role of TSA in the surveillance and approval of private citizens' travel within the country in their own personal aircraft.
4. To provide a forum for TSA to meet with actual aircraft owners and operators to learn how this proposal would apply to private use aircraft.

We appreciate TSA's consideration of this request and stand ready to work with the agency to craft a rule that will serve the security needs of this country while balancing the rights and freedoms of its citizens.

Respectfully,

A handwritten signature in cursive script that reads "Earl Lawrence".

Earl Lawrence  
Vice President, Industry and Regulatory Affairs