

The background material states the following (extracted from various parts of the document):

- a) The FAA also proposes to amend § 61.3 to remove the requirement to carry a separate government-issued photo identification for persons carrying a pilot certificate with photo. The FAA has determined two photo identifications are unnecessary and do not serve a safety or security interest.
- b) The FAA would treat the facsimile pilot certificate as a special purpose pilot authorization that may be used in conjunction with a government-issued photo identification under § 61.3. This treatment would allow a pilot whose identity has been certified by the FAA to continue to exercise pilot privileges while allowing security agencies to verify the pilot's identity against a government-issued identification.
- c) Summary of time and costs (20-year): Total \$387,460,624 & 7,597,502.66 (hours, I presume?)
- d) In conducting these analyses, FAA has determined that this rule: (1) Has benefits that justify its costs, (2) is not an “economically significant regulatory action”.
- e) Summary In this analysis, the FAA estimated future costs for a 20-year period, from 2010 through 2029. All costs in this analysis are in 2008 dollars.
- f) There are currently about 740,000 pilots and 93,000 CFIs that would be covered by this proposal.

First, I must ask, how did we come to be so far out of touch with reality?

In 'a' above, the FAA will not require two photo identifications. Given that few pilots walk or take public transportation to get to their aircraft, they still will be carrying that most common of primary pieces of identification, the driver's license. They need it on both ends regardless of FAA identity requirements. This has always worked well and I am aware of no instance where the lack of an FAA photo ID contributed to any event.

In 'b' above, in order to vet the authenticity of any pilot required to obtain a new FAA photo identification, the FAA will continue to rely on other, common forms of acceptable identification. Now, while there are many, including passports and other recognized ways to do this, the state driver's license will remain the most used. Therefore, what is the point of requiring a pilot to get another photo ID using an already-accepted form of ID to verify identity? Other than the FEAR component of the various legislative acts driving this agenda, there is no point. The change serves no articulable purpose, nor will it prevent any criminal from acting.

In 'c' and 'f' above, are there no adults in the room? Is everyone involved with this dubious process completely oblivious to what is going on? We are poised to incur over 380 million dollars of costs...more than a third of a billion dollars, waste over 7.5 million hours of everyone's time and inconvenience and penalize over 830,000 people, for what? Because 19 people, who were not citizens committed a massive crime on Sept 11, 2001? By what cost/benefit ratio is this even remotely rational? Where does suspicion of American citizens arise from this act and further factor into this equation? It is highly offensive that the mistakes and oversights on the part of government agencies, all of whom had entirely adequate tools at the time but, though inattention, ignorance or incompetence, did not do their

jobs on and before that terrible day now find it expedient and desirable to impose onerous requirements and restrictions on citizens. Shame on all of you.

In 'd' and 'e' above, by what measure do the enormous penalties in money, time and personal impact 'justify costs'? Apparently, determining the action is 'not economically significant' is made on the basis of per capita impact. On the basis of program costs, more than a third of a billion dollars certainly is very significant. And, all that is based on projections made in 2008 dollars. Any thinking person knows it will cost more in the long run.

Lastly, it's way beyond time to stop cowering in fear and letting our institutions, traditions and rights be determined by the acts of a truly miniscule handful of criminals. Let's stop pretending things such as this photo ID will provide any measurable level of safety or security and is anything other than a huge waste. A pilot's license and another government photo ID have been sufficient for years. They remain so and there is no need to create another bureaucratic scheme.

Thank you.

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