



January 9, 2026

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Electronic Delivery

Subject: Docket No.: TSA-2007-28572 - Revision of Agency Information Collection Activity Under OMB Review: Secure Flight Program.

In support, with comments.

The Air Line Pilots Association, International (ALPA), representing the safety and security interests of more than 80,000 pilots at 42 U.S. and Canadian airlines, appreciates the opportunity to comment on the Revision of Agency Information Collection Activity Under OMB Review: Secure Flight Program.

ALPA supports the revision, with recommendations. In the notice, TSA states, "TSA is revising the collection for non-traveling individuals to also request authorization to enter a sterile area at a U.S. airport directly from TSA, and TSA will issue a visitor pass for the non-traveler to enter the sterile area." As TSA works to start their visitor pass process, TSA should ensure that all necessary information pertaining to this new process be communicated to the public. This would include a public notice that there is a new TSA visitor pass program and rules or standard requirements for when it is appropriate to use the program.

There are many programs in place allowing access to the sterile area, and they all have different rules and requirements. The programs are further complicated as each airport implements its own outcome-focused compliance. Specifically for non-traveling individuals, there would now be at least three programs available to access the sterile area. This is through the airport's visitor pass program, through the airline as gate passes, and now through TSA directly. Because technology and processes have evolved, TSA should review the current sterile area access programs and consider restructuring or consolidating processes while ensuring security.

In addition to their new TSA visitor pass program, it is important that TSA ensures sufficient information is provided to the public, airport employees, and airline employees on the varying access programs. While airline and airport employees do receive training on certain programs, it would be beneficial that they understand the differences between all airport access programs available to them, when it is appropriate to use them, requirements to use them, and what actions are prohibited. We recommend that TSA work with the airlines to review current

communications to crewmembers and ensure crewmembers are receiving all necessary information to prevent violation of rules and any resulting fines or impact to their Known Crewmember[®], TSA PreCheck[®], or other risk-based screening options.

ALPA supports a balance of standardization and outcome-focused compliance in security programs. Currently, TSA primarily regulates their security programs directly with individual entities and an outcome-focused compliance approach. While that allows TSA, airlines, and airports flexibility, it also creates an exceedingly difficult and cumbersome experience for the public and aviation employees. Specifically, crewmembers must adhere to different sets of rules, for the same programs, as they travel in and out of various airports every day. This can lead to crewmembers inadvertently violating rules they were unaware of, unnecessary disagreements between Transportation Security Officers (TSOs) and crewmembers, civil penalties, and impact to crewmember's risk-based program eligibility.

ALPA recommends TSA consider restructuring how the TSA, airports, and airlines implement security programs. We recommend that TSA initiate joint industry engagement working groups to assess inconsistencies and inefficiencies in how security programs are operated across all U.S. airports with commercial airline service. Labor representation organizations should be included in these initiatives as many TSA, airline, and airport security programs directly affect aviation employees. We believe outcome-focused compliance programs can be designed to have standardized rules across all airports and airlines, but all stakeholders must come together to make it happen. We also believe that there should be coordination when established rules change to ensure the rules are aligned across airports and airlines, employees like TSOs are adequately trained, and the rules are effectively communicated prior to being implemented.

We appreciate the opportunity to comment on this notice and remain available to discuss our recommendations further as needed.

Thank you,

A handwritten signature in blue ink that reads "Wolfgang Koch". The signature is written in a cursive, flowing style.

Captain Wolfgang Koch
Aviation Security Chair
Air Line Pilots Association, Int'l