

**AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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April 16, 2007

Katrina Kletzly, Attorney-Advisor  
Office of the Chief Counsel  
TSA-2, Transportation Security Administration  
601 South 12<sup>th</sup> Street  
Arlington, VA 22202-4220

Re: OMB Control No. 1652-0042 (Jan 12, 2007)  
TSA Intent to Request Renewal of One Current Collection of Information: Sensitive  
Security Information Threat Assessments

Dear Ms. Kletzly:

The Air Line Pilot's Association, International (ALPA), representing 60,000 commercial pilots and 40 airlines in the United States and Canada, concurs with the proposals outlined in the TSA request to renew the OMB control number for the maximum three-year period in order to continue compliance with Section 525 of the Department of Homeland Security Appropriations Act of 2007 (DHS Appropriations Act) as outlined in the Federal Register, as found in Vol. 72, No. 30 / Wednesday, February 14, 2007 / Notices.

Renewal of the emergency clearance to allow this information collection request will favorably impact the ability of TSA to accurately identify those parties seeking access to SSI in a civil proceeding in federal court who successfully demonstrate a substantial need of relevant SSI in preparation of their case who are unable without undue hardship to obtain that information by other means. Further, ALPA believes that the threat assessment proposed by TSA to determine whether an individual may be granted access to Sensitive Security Information (SSI) as defined by E.O. 12958, and as further defined in the Federal Register cite is reasonable and appropriate.

We find the analysis of this proposal to be sound, and the cost, methods of implementation of changes, and projected time frame for completion of changes to be reasonable.

Thank you for this opportunity to review the TSA proposal of changes, and to provide our response for OMB consideration.

Sincerely,

Michael E. Fredericks  
Sr. Aviation Security Specialist