

## **Aviation Group Client Update**

Date: February 27, 2013

Contact: Lisa A. Harig, Partner Lindsay W. McGuire, Senior Associate

Washington DC Office New York Office

lharig@mklawdc.com lmcguire@mklawnyc.com

+1 703 247 5487 +1 516 364 1095

## TSA ISSUES 60-DAY NOTICE ON PCSR PROGRAM

Yesterday, the Transportation Security Administration (TSA) issued a <u>Notice</u> requesting public comment on a currently-approved Information Collection Request (ICR). The ICR concerns TSA's Pipeline Corporate Security Review (PCSR) program, which encompasses site visits and interviews with pipeline operators.

Under the PCSR program, TSA: (1) meets with pipeline operator's senior corporate officers and security managers; (2) develops knowledge of security planning at critical pipeline infrastructure sites; (3) establishes and maintains a working relationship with key security staff that operate critical pipeline infrastructure; (4) identifies industry smart practices and lessons learned; and (5) maintains a modal network through communications with the pipeline industry and government stakeholders. TSA considers this information to be critical to the performance of its security mission.

The PCSR Team uses topics such as security program management, vulnerability assessments, components of the security plan, security training, and emergency communications to evaluate a broad range of security issues such as physical security, cyber security, communication, and training. The PCSR Question Set also includes sections for facility site visits and operator contact information. TSA deems the PCSR Question Set responses to be Sensitive Security Information (SSI) that is protected according to regulatory requirements.

TSA is soliciting comments to (1) evaluate whether information gathered is necessary to TSA's mission, including whether the information will have practical utility; (2) evaluate the accuracy of TSA's estimate of the burden (TSA estimates the annual hour burden for the PCSR program to be 120 hours, based on TSA conducting 15 PCSR visits per year, each visit lasting 8 hours. There is no cost burden to operators.); (3) enhance the quality, utility, and clarity of the information to be collected; and (4) minimize the burden of the collection of information on responding operators, including using appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Comments are due on or before **April 29, 2013**. If you have any questions regarding the ICR or if you would like assistance in the preparation or submission of comments, please contact our office.

\* \* \* \* \*

McBreen & Kopko's Aviation Group represents air carriers, fixed base operators (FBOs), airport managers, aviation service providers, and business aircraft owners and operators on a wide range of aviation issues including regulatory matters, commercial transactions, aircraft finance matters, and bankruptcy and creditors' rights.