



CERTIFIED CARGO SCREENER PROGRAM FAQ SHEET

Key Messages:

- We are supportive of a voluntary program, like CCSP as currently explained to us by TSA, which spreads security throughout the supply chain. It is a key part of the risk-based, multi-layered approach to air cargo security this association has always endorsed. It balances the need for increased security while also meeting the needs of the shipping public. The Association also supports additional funding at the airport to meet the expected demand from those who do not participate in CCSP. There is no one solution to air cargo security and providing for shippers, forwarders, and airlines is the best way to ensure a secure supply chain.
- The 9/11 Bill specifically recognized programs such as this, as well as other non-intrusive measures approved by TSA, as an important part of the screening mandate. These provisions are critical to meet the mandate – airports do not have the real estate to screen all cargo, or even 50% of the total tonnage, moving on passenger planes with existing resources and airlines do not have the financial or human resources to efficiently expedite screening all the build ups of just in time cargo at the airport. If screening occurs at the airport, with no additional funds for airlines or airports, and with no green lane program like CCSP, there will be massive bottlenecks, which slow commerce and create new security concerns.
- We are extremely concerned about the lack of government funding for the 100 percent screening mandate. Forwarders participating in CCSP must purchase machines which may range from \$150,000 to \$500,000 per facility – a price tag that cannot be met by small and medium size forwarders, who will now face delays at the airport for cargo screening. This consolidation of the market is bad for forwarders, manufacturers and the American consumer.
- We urge Congress to provide funding to ensure the jobs of hundreds of thousands of employees in the air freight business are not lost and the American economy does not face serious harm due to a backlog in goods and products being delivered. The Airforwarders Association supports small business grants to fund CCSP as well as additional funding or reallocation of TSA's budget to provide funding for equipment and personnel devoted to cargo screening by airlines. We are also eagerly awaiting the demonstration of the 'carwash' pilot program, where third-parties (be it vendors or a consortium of forwarders) will have an off-site, stand alone facility dedicated to screening cargo for a fee and believe this is another tool that will alleviate bottlenecks at the airport.



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Q: What exactly is the CCSP?

A: In its current, 'discussion' formulation by TSA, the program allows facilities to screen cargo prior to acceptance at the forwarder or air carrier. Forwarders are also allowed to participate as a screening facility. The program is voluntary and based on a mix of CTPAT, the UK model and the Irish Known Consignor programs.

Q: What does it mean to be in the CCSP?

A: Entities must adhere to stringent security requirements set by TSA, including onsite validations, periodic inspections, maintaining strict chain of custody measures and screening cargo at the piece level. Specific technologies for use as screening devices or chain of custody measures like tamper proof seals have yet to be released by TSA. In return for this enhanced level of security, secure facilities will be able to ship certain types of cargo without invasive screening later in the chain, build bulk configurations and avoid delays and fees from scanning later in the chain.

Q: What has been the Airforwarders Association involvement in CCSP?

A: We've been very involved from the initial phases of the program. TSA turned to us for assistance in identifying shippers and forwarders who would be good candidates for participants in the first phase of the pilot program roll out. We have offered our input on the program and our concerns about funding and will continue to work with them as this effort moves forward.



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Q: Do you support the CCSP?

A: Short answer – yes, but... The long answer: The program offers a way to achieve increased security without bottlenecks at the airport cargo facilities, and many of the mechanisms involved in becoming certified are provisions we have been supportive of for a long time – non-intrusive security methods, tamper proof seals, etc. – but the real concern is in how it is implemented and specifically, who pays.

The lack of reimbursement or funding grants or any funds from the government at all make this a real problem for small and medium forwarders, and potentially all participants because Congress has yet to say this meets the ‘commensurate’ test and we have a new administration coming into TSA that could make the entire program null and void. That means forwarders have spent thousands of dollars on machines that may not meet their screening burden.

Its not just forwarders, either – if small and medium sized forwarders are forced out of the business, shippers have less choice which increases prices and that cost gets passed along to the consumer.

Q: Does it meet the commensurate test?

A: Screening was defined by Congress and specifically included a program to certify shippers security methods as screening. I think it’s difficult to make that explicit allowance to include that program as ‘screening’ and then define it out in a different part of the bill. Commensurate with the “level of security of passenger checked baggage” was explained to us by staff as just meaning it had to have the same level of confidence in security – and that is ultimately up to TSA to show that it meets the burden and GAO and Congress to evaluate that. We believe it does.

Q: If you support the program, why do you expect the government to pay for it?

A: The government and 9/11 commission have both stated on a number of occasions that homeland security is a federal responsibility. Certainly, aviation security is included on that list of responsibilities. If it is a government mandate, for a government responsibility to secure our planes, why then is it not the government’s money that provides for that security?



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Q: You've said that "we're this close to being put of business". What is causing that, is it the CCSP?

A: There are a number of issues impacting forwarders right now, from the cost of fuel to airline mergers and losing airlines like Aloha, all of which increase costs and detract from revenue. In that uncertain economic environment, a number of my members could be seriously, perhaps fatally, wounded by yet another unfunded mandate that creates an uneven market and further damages our financial bottom line.

Q: What is the Association going to do about the program?

A: We will continue working with TSA and Congress to maintain CCSP and secure funding for forwarders participating in the program.