

# ACCESS CONTROL & CHALLENGING

JUST THE BASICS



Some of you take on the role of authorized representatives, acting as agents for regulated entities, such as Indirect Air Carriers (IAC), Aircraft Operators (AO), and Certified Cargo Screening Facilities (CCSF). If you do, then you sign an agent agreement which requires you to comply with certain security responsibilities, which may hold you liable (as an entity and/or an individual) in the event the IAC, AO, or CCSF, may be found non-compliant for failure on your part to perform these requirements.

This information is being presented to you to promote awareness whether you are acting as an agent for a regulated entity or as a person in your everyday cargo business.



***Acceptance of cargo*** \*49CFR §1548.9(a) specifically covers Air Cargo being handled by an IAC or their agent, 49CFR §1544.205(a)(c) relates to aircraft operators (AO) or their agents, 49CFR §1549.101(a)(d) relates to CCSF and their agents. They address unauthorized access to cargo acceptance areas, staging areas, transfer areas, and other non-public areas (such as conveyances) for the purpose of preventing or deterring the carriage of any explosive or incendiary, any unauthorized person or any other destructive device onboard an aircraft. A violation of these regulations can result in a Civil Penalty to the IAC, AO or CCSF that you represent and an individual may also be assessed a Civil Penalty between \$1960 to \$7840 for violation of 49CFR §1540.105(a)(1) ***Security responsibilities of employees and other persons.***

*\*Code of Federal Regulations (CFR) is available to anyone online to view. Just “GOOGLE” it.*



Regulated entities (and authorized representatives acting on their behalf) must carry out challenge procedures and report unauthorized individuals observed in their security restricted areas (i.e. warehouse facilities, conveyances, etc. under their control).

Also during non-operational periods or when challenge procedures are not in effect, the regulated entity must ensure that operational doors are secured or controlled by other means.

At all times you may satisfy this requirement when the “individual” entering the restricted area has valid security or access identification (which may be required), or is escorted by an individual who has unescorted access authorization.

Make sure to conduct random checks of such individuals to insure that their presence is per the regulatory requirement.





Vehicle gate to restricted area during non operational period. What is a person trying to seek access looking for?

- Watching vehicles enter and exit and timing the movement of gate.
- Recording such activity.

It is just a fact of life in today's world. Be aware of signs that are suspicious.

Individuals lingering or gathering in an area that normally has very little traffic.

Someone taking photos or video that is out of the norm.

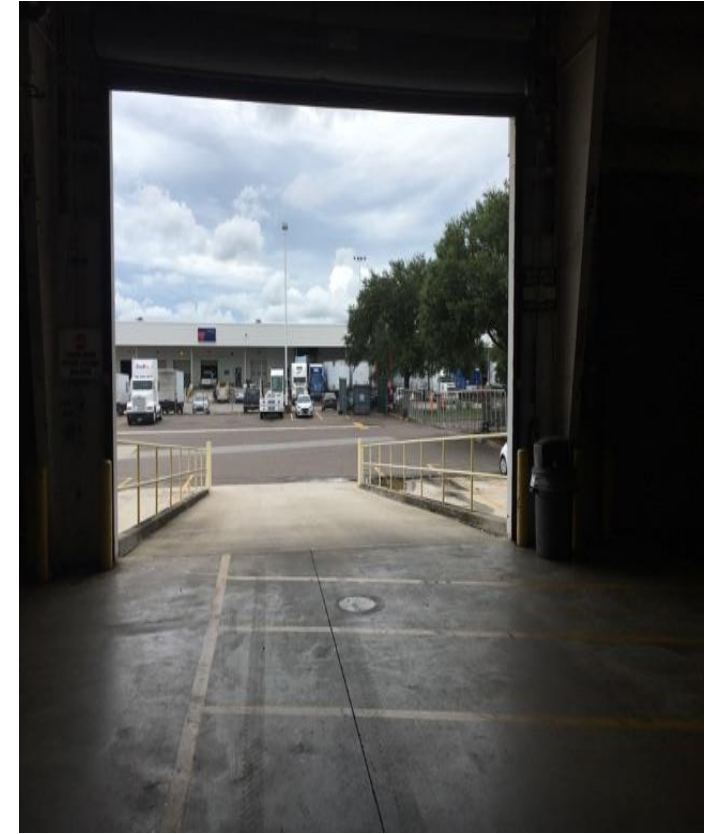




Open or unattended bay doors and unlocked entrances from a pedestrian area that lead to a restricted area into a facility where someone can compromise equipment or cargo.

Remember that those wishing to do harm to others are very patient when it comes to accomplishing their task.

They will wait and hide all day to take down a facility or an aircraft.



Step by step to a real security breach.



Surveillance. Watching the gate. Waiting for vehicle activity. Timing the gate closure after each entrance.



Beginning to make his move after vehicle exits gate.





Individual enters through gate.  
Unchallenged, unnoticed, goal almost  
achieved heading toward unsecure  
entrance way.

In this particular successful access gain,  
the individual was not only able to  
access the cargo facility but also the  
Secured Area of an airport where he had  
access to aircraft.



At your facility, the only  
difference here is that, perhaps,  
there aren't any aircraft but you  
have product that may  
eventually be tendered to an  
aircraft operator for transport  
on a passenger aircraft.



Put the aircraft aside for a moment and  
think about you and those that work  
around you and each other's safety.







Not secure at all. On left and right closed but not locked. Also on right one door completely open.





NOW.....that's what I'm talking about. All day long. Seal and/or lock or both = SECURE Load.





Don't forget the areas that lead to where your product is warehoused. When unattended CONTROL IT. If attended remember to challenge any unauthorized individuals. Remember challenge do not restrain



If someone is not recognized as having an operational need to be in the area, or is exhibiting suspicious behavior, are not displaying proper credentials as established by your company, or is not under approved escort. **CHALLENGE** effectively:

- Confront the individual and determine their authorization
- Attempt to escort them out of the restricted area
- Stay with them until authority arrives
- If they become aggressive contact per your established emergency procedures, do not attempt to restrain such an individual ever
- If aggressive; try and maintain visual contact until authorities arrive

**IF YOU SEE SOMETHING SAY SOMETHING**.....because only you know what's supposed to be in your everyday. Being informed and being alert plays a critical role in keeping our nation safe. In keeping all of us safe. **IF YOU HANDLE AIR CARGO MAKE SURE THAT YOU HAVE LOCAL TSA EMERGENCY CONTACT NUMBERS FOR YOUR AREAS THAT YOU SERVE.**

**And remember.....Authorized Rep/Agent + Signed Agreement = Regulated Entity**

