

**Statement for the Record of Mr. Brandon Fried, Executive Director,
Airforwarders Association**

TSA's Efforts to Advance Risk-Based Security

**House Committee on Homeland Security, Subcommittee on Transportation
Security**

April 11, 2013

Chairman Hudson, Ranking Member Richmond and members of the subcommittee, thank you for this opportunity to present the views of the Airforwarders Association (AfA) on the Transportation Security Administration's (TSA) efforts to advance risk-based security.

The Airforwarders Association represents 360 member companies employing tens of thousands of employees and dedicated contractors. Our members range from small businesses employing fewer than 20 people to large companies employing well over 1,000 and business models varying from domestic to worldwide international operations. Additionally, a few of our members operate their own aircraft. In short – we are the travel agents for freight shipments. We move cargo throughout the supply chain in the most time and cost efficient manner whether it is carried on aircraft, truck, rail or ship.

With respect to the subject of this hearing, the Airforwarders Association commends TSA's continuing review of policies and the movement to develop risk-based security strategies. Safety and security are at the core of our members' livelihood. We fully embrace the concept of risk-based, multi-layered security to balance risk and freedom of commerce. Our members have invested millions of dollars in security screening equipment, secure systems and facilities, employee background checks, and annual security training in an effort to secure our portion of the global supply chain.

The Airforwarders Association also commends the efforts of U.S. Customs and Border Protection on its willingness to engage the private sector on the Air Cargo Advanced Screening (ACAS) pilot. As Mr. Mike Mullen notes, the pilot has proven to be extremely successful in the express operator domain. With respect to ACAS, we have three points for the U.S. Government to consider:

- 1) Ensure sufficient data from the airforwarder community before moving to rulemaking

While the express carriers have proven that transmitting limited information on a shipment can enable CBP to produce an adequate risk assessment, we believe that additional analysis is warranted for the airforwarder community. There are significant differences in the business models of express carriers and airforwarders. To date, only three airforwarders are currently in the operational phase with several more transitioning to this critical stage. We urge that CBP not move to rulemaking until additional airforwarders have the opportunity to participate in the pilot at the operational level. We believe that CBP will increase its knowledge of the airforwarder community by extending the pilot and will ultimately improve both the data quantity and the data quality from the airforwarder community leading to a more thorough integration and understanding of the different kinds of transactions performed by forwarder participants.

2) Flexibility of data transmission

The submission of ACAS data must be flexible to allow freight forwarders to submit data using various technology mechanisms.

3) International harmonization

We also strongly encourage the U.S. Government to advocate the benefits of harmonization to our international partners. It is critical that the U.S work with the international community to develop recognized standards, procedures and data provision. Attaining a global solution will allow international trade partners to share data globally and allow for both the optimization of the supply chain and a robust global risk assessment of cargo.

Thank you for this opportunity to share the views of the Airforwarders Association.