
&

Notice of Violation Program

CMAA President Signature: _________________________

CMAA President Approval Date: _____________________

Last Revised: ______________
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I. PURPOSE

This manual is a reference guide to security procedures at the Chattanooga Metropolitan Airport.

The purpose of this document is to assist persons working at the Chattanooga Metropolitan Airport in understanding TSA and Airport Authority rules and regulations concerning security.

This manual contains specific rules and regulations, as well as information relating to compliance and enforcement. Direction is also provided regarding identification badges, access procedures, escorts and alarm monitoring.

This manual is intended to describe in general, the content, identity and essential functions set forth regarding security requirements for working at the Chattanooga Metropolitan Airport. It is not to be construed as an exhaustive list of security functions or requirements.

II. DEFINITIONS

AIR OPERATIONS AREA (AOA) - Those portions of an airport specified in the airport security program (ASP), in which specific security measures are carried out. This area includes aircraft movement areas, aircraft parking areas, loading ramps, and safety areas for use by aircraft regulated under 49 CFR Part 1544 or 1546, and any adjacent areas (such as general aviation) that are not separated by adequate security systems, measures, or procedures. This area does not include the Secured Area.

AIRPORT SECURITY COORDINATOR (ASC) - The ASC is the Transportation Security Administration’s (TSA) point of contact for any security matters. In addition, the ASC is responsible for ensuring compliance with the TSA approved Airport Security Program, federal regulations and Security Directives.

AIRPORT SECURITY PROGRAM (ASP) – A security program approved by TSA under 49 CFR Part 1542.101. The ASP is regulatory in nature, and once approved by TSA it must be strictly followed.

CMAA – The Chattanooga Metropolitan Airport Authority.

ESCORTED ACCESS – Unbadged individuals needing temporary access to the AOA, SIDA, Secured Area or other areas controlled for security purposes must be escorted by a person that has a current, valid badge for the area where the escort is being conducted.

FOREIGN OBJECT DEBRIS (FOD) - Any loose object or debris on the AOA.

FP CHRC – Fingerprint Criminal History Records Check

ID – Identification (as in ID badge)
RESTRICTED AREA - Any area of the airport inside the perimeter fence where personnel must display a security badge.

SECURED AREA – A portion of an airport, specified in the ASP, where aircraft operators and foreign air carriers enplane and deplane passengers and sort and load baggage.

SECURITY IDENTIFICATION DISPLAY AREA (SIDA) – Any area requiring each person to continuously display airport approved identification, unless the person is under an airport approved escort.

STERILE AREA – a portion of an airport…that provides passengers access to boarding aircraft and to which the access generally is controlled by TSA or by an aircraft operator under 49 CFR part 1544… (1540.5)

UNESCORTED ACCESS - Authorization given by the CMAA to be in the Secured Area, SIDA, or other areas controlled for security purposes without a proper escort. This privilege is assigned to those individuals that have met all TSA and Airport Authority requirements for such access. When an employee is granted Unescorted Access, the responsibilities associated with it are immediately assigned as well. In other words, this is the point at which the employee becomes a part of the CMAA "Security Team”.

III. BADGES

At the Chattanooga Metropolitan Airport, a uniform system of personnel recognition and identification has been established. Color coded identification badges issued by the CMAA are the major instruments for recognition of authorized personnel. Identification badges as well as security training are required for all persons that have access to the AOA, SIDA, Secured Area and Sterile Area. A valid ID badge must be worn at all times while in the AOA, SIDA or Secured Area above the waist and below the neck, on the outer most garment. If a company badge is worn along with the airport badge, the airport badge must be displayed on top. All personnel that is based at CMAA or has a work related operational need must be badged (exception being transient pilots). Employees must have a valid reason to be on the airfield or sterile area.

A. Badge Application

To receive an identification badge, the applicant’s employer or sponsor must be registered with the ASC prior to beginning the application process. After filing all necessary documents, the employer or sponsor may then ensure the applicant’s badge application is completely filled out, and sign the back of the badge application form indicating the applicant is authorized to attend security training.

Individuals requesting access to the AOA must complete the AOA/ID Only application form. This form must be signed by the individual’s employer or sponsor.

Individuals requesting access to the Secured Area, sterile area or SIDA must complete the Secured Area/SIDA application form and the Fingerprint Application Form. Once these forms
have been signed by an authorized employer or sponsor, the applicant must submit to fingerprinting. When the fingerprint results are returned to the airport they will be reviewed by an ASC and the applicant will be in one of three categories:
1. approved for security training
2. denied for security training
3. asked for additional information regarding the results of the FP CHRC

B. Badge Use

The ID badge issued remains the property of the CMAA, however it is issued to the applicant for as long as he/she has an operational need to be on the AOA, Secured Area or in the Sterile Area. This ID badge is never to be loaned or borrowed. It is issued strictly for use by the individual to whom it is issued.

It is the responsibility of the employer or sponsor to immediately collect identification badges from employees who no longer work for the company (or in the case of a sponsor, associated with the organization) and return them to an ASC, Operations Specialist or an Airport Police Officer. Badges not returned within 24 hours of termination may result in the assessment of a financial penalty to the employee/employer/sponsor. These penalties are outlined on the back of the badge application form.

Lost badges must immediately be reported to an ASC or the airport police at 855-2204. Once a badge has been reported lost, it will be deactivated in the access control system. The fee for replacement of a lost badge is outlined on the back of the badge application form. A letter signed by the employer’s certifying official must also be submitted on company letterhead describing the circumstances surrounding the lost badge. If the lost badge is subsequently located and returned to the identification office, a refund will be issued.

C. Contractor and Construction Badges

Construction and Contractor employees working in AOA, SIDA or Secured Area are required to have an airport identification badge.

The ASC will set the ratio of airport badged to company badged employees depending on the location and number of non-badged employees working in the area. There must also be an airport badged site supervisor in the area at all times with non-airport badged employees.

D. Expired ID Badges

It is the responsibility of each badge holder to maintain a current ID. Any individual challenged who is displaying expired ID media will be treated as have gained unauthorized access to the AOA in violation of the CMAA’s Safety and Security Rules and Policies.
IV.  CHALLENGE PROGRAM

When an employee is granted Unescorted Access to the AOA, SIDA, Secured Area or Sterile Area at the Chattanooga Metropolitan Airport, the responsibilities associated with that Unescorted Access are immediately assigned as well. In other words, this is the point at which the employee becomes a part of the Chattanooga Metropolitan Airport "Security Team".

TSA and CMAA rules and regulations require badge holders to challenge everyone located in the AOA, SIDA and Secured Area. Challenging is simply checking a person’s ID to ensure that the individual may legitimately have access to that area. When challenging, you should check to make sure the photo on the ID matches the individual displaying the ID and check the expiration date to ensure the ID is current. If you are unsure if the individual belongs in that area, contact airport police at 855-2204.

If you encounter an individual that is not displaying a proper ID or is not being properly escorted, escort that individual outside of the perimeter fence and contact airport police at 855-2204. If the individual is unwilling to cooperate with your instructions, do not force them. Instead make your way to a telephone and contact airport police at 855-2204.

In order to measure the effectiveness of this regulation, the CMAA has developed a program referred to as SCAN (Stop Challenge and Notify). SCAN is designed to provide feedback to the CMAA and Airport Tenants regarding security compliance at the Chattanooga Metropolitan Airport. In accomplishing this objective, test subjects assess compliance with regulations by attempting to circumvent or bypass security measures in several areas. Test subjects may attempt to follow employees through AOA, SIDA, or Secured Area access points, or walk in restricted areas without proper identification etc.

Employees that properly challenge test subjects and comply with security measures are often issued rewards in appreciation of their efforts. Conversely, employees that fail to challenge test subjects or comply with security measures may receive a Notice of Violation along with associated penalties including access revocation and badge confiscation.

V.  ESCORT PROCEDURES

Any individual with a current and valid ID is authorized to provide an escort to an unbadged individual who has an operational need to be on the airfield. The person providing the escort MUST be in control of the visitor at all times, to include maintaining visual contact with the individual being escorted. The maximum escort ratio is 5:1 with exceptions for air carrier enplaning and deplaning operations. In the case of enplaning and deplaning operations, the air carrier personnel must have enough staff monitoring the en/deplaning process to maintain control of the passengers. This includes maintaining control of the terminal door through which the passengers are gaining access to the ramp or terminal at all times. The individual who “times out” or shunts a door for the purpose of enplaning or deplaning passengers is the individual who the CMAA will hold accountable for maintaining security of the terminal boarding door.
No door may be “timed out” or shunted for more than 30 minutes at a time. This means that when the door is programmed to be “timed out” or shunted, no more than 30 minutes may be entered into the access control system.

Individuals with a valid or expired badged at the Chattanooga Metropolitan Airport may not be escorted.

Individuals who fail to qualify for Unescorted Access to the Secured Area or sterile area because of a disqualifying crime conviction may not be escorted in the Secured Area or sterile area for any reason.

A. Vehicle Escorts

Vendors requiring temporary vehicle access to the AOA, SIDA or Secured Area must be escorted at all times by the tenant they are servicing. Unless otherwise approved by the Airport Authority, tenants are limited to a 1:1 escort ratio. Private pilots are not permitted to conduct vehicle escorts.

VI. AIRFIELD ACCESS

Access into the AOA is controlled in one of three ways: locks and keys, prox cards, and pin number/pin pads. Any person requiring access inside the perimeter fence should be able to gain access on their own using their assigned means of access. Any individual, with or without what appears to be a legitimate ID, who is not able to gain access to the AOA on their own and is requesting that you let them in should be considered suspicious. Do not let the person inside the fence and immediately notify airport police at 855-2204.

A. Vehicle Access

To gain access inside the perimeter fence, a vehicle must have a current CMAA issued AOA or Secured Area hang tag and the driver must possess a CMAA issued identification badge along with AOA driving privileges (a “D” on their badge), or be escorted by someone with said privileges.

In all cases the vehicle driver must remain and observe the access gate until it fully closes.

B. Construction and Contractors

Contractors and construction employees may only enter through designated or assigned gates. Employees must possess a CMAA issued identification badge or be escorted by someone with a CMAA issued identification badge. Badging requirements (including the ratio of badged to non-badged employees, as well as the ratio of vehicles registered with the airport to non-airport registered vehicles) vary by project. These numbers will be determined by the ASC for each individual project.
VII. ACCESS CONTROL

Code of Federal Regulations 49CFR Parts 1542.201, 1542.203, 1542.205 and 1542.207 mandate that the Chattanooga Metropolitan Airport maintain a security system that will ensure that only authorized persons have access to secured areas and that access be denied immediately at access points, to individuals whose access privileges have changed. The system must also differentiate between persons authorized to have access to a particular portion of the secured area and be capable of limiting an individuals’ access by time and date. The Chattanooga Metropolitan Airport meets these requirements through the Access Control and Alarm Monitoring System (ACAMS).

A. Access Points

All persons entering the Secured Area must enter through an access point that allows for authorized access in accordance with 49 CFR 1542. At the Chattanooga Airport, all doors that give access to the Secured Area are equipped with a key lock or card reader. Badges issued by the Airport Access Control Office are encoded with information that identifies the badge holder and their specific areas of authorized access at the airport. In attempting to gain access to the Secured Area, each individual badge holder is required to swipe their ID and let the access control system determine if they are to be granted access. No person may enter the Secured Area without individually seeking authorization, and no badge holder shall permit another person to enter the Secured Area through use of his or her badge ID. (hereinafter, piggybacking).

An airport issued identification badge does not give the badge holder unlimited access to all areas of the airport. There must be a duty related need for company business in order to access the AOA, SIDA or Secured Area. Individuals located in areas where they are not authorized for access will be dealt with as security violators.

B. Access Point Alarms

Persons responsible for causing a door to alarm must remain at the door, notify the Airport Police (855-2204), and provide them an explanation for the alarm. NO PENALTIES will be assessed to a person who remains at the door until cleared by the Airport Police. If a door is alarm is activated and the individual responsible does not remain at the door, the police will investigate. When the violator is located, a citation through the NOV process (as outlined in Section 8) will be issued to that individual. Penalties for this violation range from revocation of access privileges and badge confiscation for five days to permanent revocation.

If an audible alarm is heard inside the terminal or on the AOA, the person hearing the alarm should contact the airport police at 855-2204 and provide information such as the location of the alarming door or gate, a description of the violator and the last direction of travel, if known.
VIII. ENFORCEMENT

The Chattanooga Metropolitan Airport Police Department consists of state certified law enforcement officers with full arrest powers. The Airport Police enforce airport rules and regulations, as well as local, state and federal laws at the Chattanooga Metropolitan Airport. The Airport Authority has also authorized members of Airport Administration, the Operations Department and ASC, to conduct inspections and issue violations regarding safety and security on the airfield, ramp and construction areas of the airport. All violators will receive a written Notice of Violation (NOV). If deemed necessary, any of the above mentioned airport staff may also immediately revoke or suspend and confiscate the airport identification badge for any violation of the Airport Rules and Regulations.

Appeals from the receipt of a NOV may be filed, in writing, to the primary ASC. The ASC will then review the information submitted and make a decision as to whether a violation occurred and/or whether any sanctions imposed as a result of the violations of appropriate under these policies. Further appeals to the decision of the ASC will be heard, with a presumption of correctness accorded to the findings of the ASC, by the CMAA Vice President of Operations or his/her designee. Appeals to the decision of the CMAA Vice President of Operations will be heard by the CMAA President and CEO. Appeals to the decision of the CMAA President and CEO will be heard by CMAA Board of Commissioners.

IX. PENALTIES

Penalties that are imposed as a result of safety or security rules violations will be categorized in one of three levels. The list below is not exhaustive and violations not listed below will be dealt with on a case by case basis.

A. LEVEL 1

Citations issued as a result of the following offenses (listed after part C) will require the recipient to re-take the security training course within 15 days of the offense. A subsequent LEVEL 1 offense within 12 months of the first will result in a 24 hour suspension of access privileges and the offender must attend the next regularly scheduled security training class. In addition, the offender’s supervisor must provide the ASC a letter on company letterhead indicating he/she is aware this is the offender’s second violation, certified that counseling of the offender has taken place. A third LEVEL 1 offense occurring within any 12-month period will result in the suspension of access privileges for five (5) days and the offender must attend security training within seven (7) days.

B. LEVEL 2

Citations issued as a result of the following offenses will require the recipient to re-take the security training class within seven (7) days, and a suspension of access privileges for 24 hours. A subsequent Level 2 offense within 12 months of the first will result in the revocation of access privileges and badge confiscation for five (5) days, and will require the offender to re-take the
next regularly scheduled security training class. In addition, the offender’s supervisor must provide the ASC a letter on company letterhead indicating he/she is aware this is the offender’s second violation, and certify that counseling has taken place. A third LEVEL 2 offense occurring within any 12-month period will result in badge confiscation and revocation of airport access privileges for 30 days and will require the offender to re-take the security training class within seven (7) days.

C. LEVEL 3

Citations issued as a result of the following offenses will result in the revocation of airport access privileges and badge confiscation for five (5) days for the first offense. Any subsequent LEVEL 3 offense within 12 months of the first will result in the revocation of airport access privileges and badge confiscation for 30 days and mandatory security training at the next regularly scheduled security training class. In addition, the offender’s supervisor must provide the ASC a letter on company letterhead indicating he/she is aware this is the offender’s second violation, and counseling has taken place. Any additional Level 3 offense within 12 months may result in permanent revocation of airport access privileges.

<table>
<thead>
<tr>
<th>Section</th>
<th>Violation</th>
<th>Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>III</td>
<td>Improper display of ID</td>
<td>1</td>
</tr>
<tr>
<td>IV</td>
<td>Failure to challenge</td>
<td>1</td>
</tr>
<tr>
<td>VII (A)</td>
<td>No operational need to be in the area where the individual was challenged</td>
<td>1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section</th>
<th>Violation</th>
<th>Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>III (D)</td>
<td>Being present inside the perimeter fence with expired ID</td>
<td>2</td>
</tr>
<tr>
<td>V</td>
<td>Exceeding pedestrian escort ratio</td>
<td>2</td>
</tr>
<tr>
<td>V</td>
<td>Failure to maintain control of passengers/boarding door</td>
<td>2</td>
</tr>
<tr>
<td>V (A)</td>
<td>Exceeding vehicle escort ratio</td>
<td>2</td>
</tr>
<tr>
<td>VII (A)</td>
<td>Piggybacking</td>
<td>2</td>
</tr>
<tr>
<td>VII (B)</td>
<td>Failure to remain at an alarming door</td>
<td>2</td>
</tr>
<tr>
<td>VII (B)</td>
<td>Failure to notify airport police of a door alarm</td>
<td>2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section</th>
<th>Violation</th>
<th>Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>III (B)</td>
<td>Loaning/borrowing an ID</td>
<td>3</td>
</tr>
<tr>
<td>V</td>
<td>Escorting someone whose access is revoked or suspended</td>
<td>3</td>
</tr>
<tr>
<td>VI</td>
<td>Circumventing the access control system</td>
<td>3</td>
</tr>
</tbody>
</table>

Note: Additional civil penalties up to $11,000 may be imposed by the TSA for any security violation that takes place.

The violations listed above represent several of the most common violations for which citations are issued. It must not be construed as a complete list of federal and state laws or Airport Rules and Regulations that are enforceable on airport property.
**WARNING:**

ANY PERSON LOCATED IN A RESTRICTED AREA WHILE THEIR ACCESS IS REVOKED AND BADGE CONFISCATED WILL BE SUBJECT TO ARREST AND PROSECUTION.

<table>
<thead>
<tr>
<th>X TELEPHONE NUMBERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Police Department (Airport Dispatch Center)</td>
</tr>
<tr>
<td>Airport Police EMERGENCY</td>
</tr>
<tr>
<td>Airport Identification Office</td>
</tr>
</tbody>
</table>
| Security Coordinator | 421-8763 (cell)  
                          | 855-2208 (office) |
| Airport Operations | 595-8107 (cell)  
                       | 855-2265 (office) |
| Airport Operations Supervisor | 595-0122 (cell)  
                                    | 855-2265 (office) |
I, (print name) ____________________________ acknowledge that I have received, read, and agree to comply with the policies and procedures as outlined in the Security Reference Manual and Notice of Violation Program.

______________________________  ________________
Signature                          Date