

Exhibit C

SAN DIEGO INTERNATIONAL AIRPORT

SECURITY INSTRUCTIONS

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November 5, 2009

I. GENERAL AIRPORT SECURITY

1. The Federal Government has established strict and detailed security requirements that all air carriers and airport operators must comply with to guard against terrorist acts and other threats to civil aviation security. Security regulations and requirements have been designed and implemented to prevent or deter unlawful acts against civil aviation. These regulations include prohibiting persons from gaining unauthorized access to an aircraft or to restricted areas of the airport (any area where aircraft operate or park, to include: runways, taxiways, ramps, hangars, aprons and other aircraft parking areas). All activities of contractors, vendors, consultants and service providers (Contractor) must comply with these security regulations as they apply to their work at San Diego International Airport (SAN).
2. Aviation Security & Public Safety (Airport Security) personnel, Transportation Security Administration (TSA) officials, San Diego Unified Port District Harbor Police Officers, Airport Operations (Airside and Landside) personnel, Construction Administration personnel, Airport Maintenance personnel and Airport Facilities personnel monitor airport Contractor activities. However, it is the responsibility of the Contractor, and the designated Chief of Security (if applicable), to ensure compliance with these requirements. The Contract Manager, Airport Security, and Airport Operations will insist on the total adherence to all applicable Federal, State, City and Airport rules and regulations.
3. The following review of the security rules pertaining to SAN is provided for the Contractor's direction and guidance. This review may not discuss all security requirements, but serves as a guideline to familiarize the Contractor with some general airport security requirements.
4. NO WORK ON THE AIRPORT CAN BEGIN UNTIL CONTRACTOR PERSONNEL, INCLUDING THE CONTRACTOR'S CHIEF OF SECURITY, IF REQUIRED, HAVE BEEN BRIEFED BY THE MANAGER, AVIATION SECURITY & PUBLIC SAFETY (MASPS) OR AIRPORT SECURITY COORDINATOR (ASC).

II. PERIMETER FENCE AND GATE SECURITY

1. If the project requires access through the airport perimeter fence, the Contractor:
 - A. Shall use only designated perimeter access gates and follow a pre-approved travel route.

- B. May be issued, and be responsible for, media allowing access to pre-determined and approved gates.
 - C. Shall not install any type of locking device that is independent of the airport-controlled locking system.
2. Airport Security approval is required for any proposed modifications to the airport perimeter security system. Security fencing and/or gate construction shall be in conformity with applicable Transportation Security Regulations (TSRs) and Federal Aviation Administration (FAA) Advisory Circular(s), which are available through Airport Operations-Airside. Integrity of the perimeter fence and gate system shall be strictly maintained at all times. There shall be no exceptions. Spaces between gate end posts to fence support posts shall not exceed two (2) inches. Spaces from fence end posts to adjacent building structures shall not exceed three (3) inches. Spaces beneath fencing shall not exceed three (3) inches from the bottom of the fence fabric to surface grade.

III. DOORWAY SECURITY

1. During the course of Contractor activities, positive security controls shall be maintained to prevent unauthorized access to restricted areas of the airport. Full height barrier walls, if installed, shall be maintained to provide a secure barrier at all times. Existing doorways and temporary doorways, if installed, shall be secured or guarded with authorized personnel at all times. In some areas, these requirements may cause substantial revision of normal construction procedures and modification of manpower requirements. Temporary doors that allow access to restricted areas installed for use by Contractor personnel, shall be secured with a lock issued by Airport Security or Airport Operations, or by other means approved by Airport Security.
2. THE CONTRACTOR SHALL:
- A. Never allow a security access door to be propped open unless a guard is posted at the door to prevent unauthorized access. Guards must be approved and trained by Airport Security.
 - B. Not modify a security access door closure device or automatic locking mechanism. All security access doors must close and lock automatically unless otherwise approved by Airport Security.
 - C. Never use an emergency exit (alarmed door) for access, unless authorized by Airport Security or Airport Operations.
 - D. Complete a Tool Inventory Log (Attachment 1 of this Exhibit) when working within a Sterile Area (i.e., passenger boarding areas within

the terminal buildings, beyond the security screening checkpoint), for all prohibited items entering and exiting the Sterile Area. This inventory shall be made available to Airport Security or Airport Operations (or a designated representative) for verification of compliance.

IV. AIRPORT IDENTIFICATION BADGES

1. GENERAL GUIDELINES

Airport security identification badges are required for individuals to be allowed unescorted access to the restricted, Secured, Security Identification Display Area (SIDA), or Sterile areas of San Diego International Airport. All individuals accessing or moving within the restricted, Secured, SIDA, or Sterile areas must either possess and properly display a valid picture SAN ID badge or Sterile Area Access badge; or display a SAN Visitor, Escort Required (Visitor) ID badge and be under approved escort AT ALL TIMES while in these areas.

There shall be at least one (1) Contractor supervisor/foreman with a valid SAN ID badge in each work area at all times. An individual with a valid SAN ID badge with Escort Authority (red ESCORT stripe) may escort up to five (5) visitors at a time, as long as all individuals being escorted remain within a twenty-five foot (25') escort control zone of the person conducting the escort. The Contractor supervisor/foreman shall escort and vouch for all Contractor or subcontractor personnel issued a SAN Visitor ID badge in the work area.

Escort means to accompany or supervise an individual who does not have unescorted access authority to areas restricted for security purposes, as defined in the Airport Security Program, in a manner sufficient to take action should the individual engage in activities other than those for which the escorted access is granted. The Contractor may be required to meet additional escort requirements as conditions necessitate (e.g., Attachment 2 to this Exhibit - or as amended). Individuals who are issued a SAN ID badge or Sterile Area Access badge; but are not in possession of the badge may not be escorted. Any individual on-premises for more than fourteen (14) calendar days performing duties in areas requiring identification must obtain a SAN ID badge or Sterile Area Access badge, as appropriate.

2. PROCEDURES TO OBTAIN AN AIRPORT IDENTIFICATION BADGE

A. A SAN ID / Sterile Area Access badge is requested by the Contractor's Chief of Security or Project Manager; and approved by Airport Security. The Access Control Office (ACO) collects all data and issue badges.

- B. A Fingerprint-Based Criminal History Records Check (CHRC) Access Investigation and Security Threat Assessment (STA) is required for all SAN ID / Sterile Area Access badge applicants. Investigations will be performed by Airport Security at a current cost to the Contractor of twenty-seven dollars (\$27.00) per applicant. All fees are subject to change. The fee includes one reprint, if necessary. Should an individual's fingerprints be deemed unclassifiable more than twice and the Contractor still desires a SAN ID / Sterile Area Access badge for that individual, an additional twenty-seven dollars (\$27.00) fee shall apply for each submittal until the individual's record is cleared; or the individual's information may be sent to the TSA for a manual records check. This manual check may exceed sixty (60) days in duration. Applicants should note that the STA requires a significant amount of information be provided to TSA; and they should be prepared to provide information regarding their identity, citizenship, and work authorization status. Applicants may be randomly selected for a ten (10) year employment/reference investigation conducted by Airport Security through a third-party private investigator. These investigations are at no cost to the contractor. Investigations are not required for individuals issued a SAN Visitor ID badge. Investigation application details will be explained to individuals applying for a SAN ID / Sterile Area Access ID badge or the Contractor's Chief of Security. The Contractor shall explicitly follow investigation procedures and ensure the applicant obtains all required information prior to submitting an individual for an investigation. When the Contractor submits an application for a SAN ID / Sterile Area Access ID badge, the Contractor is certifying to the best of their knowledge and judgment that:
- (1) The Access Investigation has been accomplished for the individual applying for a SAN ID / Sterile Area Access ID badge in accordance with prescribed guidelines;
 - (2) There are no discrepancies between what the applicant stated versus what the Access Investigation revealed; and
 - (3) The applicant is eligible to have unescorted access to restricted areas of the airport and is not a security risk.
- C. Security training and testing is required for all SAN ID / Sterile Area Access ID badge applicants. Security education consists of administering an approved training program, conducted by Airport Security. SAN ID badge applicants will be tested on their knowledge of security procedures by the ACO. Successful applicants will be issued a SAN ID / Sterile Area Access ID badge.

- D. A SAN ID badge allows the following privileges:
- (1) Access to a work area within restricted areas of the airport.
 - (2) Upon issuance of Escort Authority; authorization to escort workers with a SAN Visitor ID badge to, from, and within restricted areas of the airport.

NOTE: A Sterile Area Access ID badge allows an individual access to the Sterile Area ONLY. Access is granted only after undergoing the passenger screening process. The Sterile Area Access ID badge does allow escort of personnel in the Sterile Area after such escorted personnel have undergone the passenger screening process. Escorted personnel must be identified by a Visitor Escort required identification badge.

- E. A SAN Visitor ID badge does not contain the badge holder's picture; and security training is not a requirement for use. Visitor badges are issued on a daily basis and are valid for up to twenty-four (24) hours. Visitor badges are issued either by Airport Security, Airport Operations, the project or contract manager, or by the Contractor. Visitor badges shall be accounted for by use of a sign-in/sign-out log and surrendered at the end of each workday.
- F. All SAN ID / Sterile Area Access ID badges shall be surrendered at the completion of the project, or at the direction of Airport Security, Airport Operations, or the project or contract manager. Failure to return any SAN ID / Sterile Area Access ID badge at the completion of the project, or at the request of Airport Security or Airport Operations, may result in the withholding of contract payments or criminal prosecution against the individual badgeholder, as appropriate. The current fee for a replacement SAN ID is seventy-five dollars (\$75.00). Any individual with a loss / theft of three (3) SAN ID / Sterile Area Access ID badges shall have their badge privileges revoked permanently.
- G. SAN ID / Sterile Area Access ID badges are issued to specific individuals and are not transferable. Random ID checks may be made at any time by Harbor Police, Airport Security, Airport Operations, or the TSA to monitor compliance.

3. REQUIREMENTS FOR WEARING IDENTIFICATION BADGES

- A. When working in restricted areas of the airport, continuous display of a valid SAN ID / Sterile Area Access ID badge or SAN Visitor ID

Badge is **MANDATORY** for all personnel.

- B. The badge shall be worn on an individual's outermost garment, at waist level or above, so as to be readily visible by casual

observation. The ID badge shall not be covered by other identification or clothing.

V. **CHALLENGE PROCEDURES**

Complying with approved challenge procedures is the responsibility of ALL individuals issued a SAN ID badge. All Contractor personnel issued a SAN ID badge, not just foremen and supervisors, shall challenge anyone in restricted areas of the airport not properly displaying a SAN ID badge, or under approved escort. Challenge procedures are explained in the security training program.

VI. **DRIVING ON THE AIR OPERATIONS AREA (AOA)**

1. **VEHICLE PERMITS**

- A. All Contractor vehicles, licensed for public roads, operating in restricted areas of the airport shall display either a Permanent, Temporary, or Visitor SAN AOA vehicle permit, unless otherwise authorized by Airport Security or Airport Operations.
- B. The length of the construction project, among others, will be a determining factor as to whether a Permanent, Temporary, or Visitor SAN AOA Vehicle Permit will be issued.
- C. Vehicle permits are requested by the project / contract manager or by the Contractor's Chief of Security. Vehicle permits are authorized by Airport Security and issued by the ACO.
- D. An application for a SAN AOA Vehicle Permit is required for each vehicle requesting access to the AOA. Proper proof of insurance shall be furnished at the time of application. The Contractor must provide insurance as required in the Special Conditions.
- E. Vehicle permits shall be displayed and controlled as directed by Airport Security.
- F. Permanent and Temporary vehicle permits shall not be transferred from one vehicle to another unless specifically authorized by Airport Security.

- G. Vehicle permits are valid for specific airport areas and specified lengths of time.
- H. Vehicle permits shall be surrendered at the completion of the project / contract, or at the direction of Airport Security, Airport Operations, or the project / contract manager. Failure to return any vehicle permit at the completion of the project, or at the request of the Airport, may result in the withholding of contract payments or criminal prosecution against the Contractor, as appropriate. The current replacement fee for vehicle permits is twenty-five dollars (\$25.00) per permit.

2. VEHICLE IDENTIFICATION AND MARKINGS

All vehicles that are operated without escort on the Air Operations Area (AOA) shall be marked so as to be readily identifiable. The Contractor's Company logo, name or other distinctive markings, as approved by Airport Security or Airport Operations, shall be visible from both sides of the vehicle at all times while on the AOA. Magnetic decals or painted logos are acceptable to comply with this requirement. Homemade paper, cardboard or hand-printed signs/logos are not acceptable and do not comply with this requirement.

AMBER ROTATING ROOFTOP BEACONS ARE REQUIRED FOR ANY CONTRACTOR VEHICLE OPERATING ON THE AOA AT NIGHT, OR IN INCLEMENT WEATHER. All Contractor Visitor vehicles and non-permitted heavy construction equipment operating on the AOA during daylight hours shall display an orange and white, 3'x 3' checkerboard flag to identify them as Contractor / construction vehicles.

3. VEHICLE CONTROL

- A. Properly authorized vehicles having official business on the airport may operate within specified areas of the AOA. Vehicles shall not be operated within 100 feet of any runway or taxiway, unless authorized and escorted by Airport Operations.
- B. Vehicles are restricted to the Contractor's work location and within the prescribed travel (haul) route. All vehicles shall follow the prescribed travel route and the identified Vehicle Service Roads. All traffic control signs and instructions shall be adhered to at all times.

4. AOA DRIVER TRAINING

All individuals who operate any type of vehicle on the AOA, with the exception of Visitors, **MUST** possess a valid SAN AOA Driver endorsement. Individuals requesting the privilege to drive a vehicle on the AOA must be authorized by Airport Security, Airport Operations, or the Contractor's Chief of Security. All AOA driver applicants must attend an approved AOA driver training program class, administered by Airport Security or Airport Operations. AOA driver applicants will be tested on their knowledge of AOA driving rules and regulations. Successful applicants will be issued a SAN AOA Driver endorsement on their SAN ID badge at the ACO. AOA driving privileges may be revoked at any time, by Airport Security, Airport Operations, or the Contractor's Chief of Security for AOA driving infractions. The operator of any vehicle, who drives onto a runway or taxiway without authorization from Airport Security or Airport Operations, is in violation of a major safety / security rule and will not be authorized to operate a vehicle on the AOA for the remainder of the project or contract.

VII. ESCORTING VEHICLES

1. Vehicles that are operated on the AOA without a Permanent or Temporary SAN AOA Vehicle Permit **MUST** be under the control of an approved escort at all times. Vehicle escort procedures are as follows:
 - A. The vehicle performing the escort shall be issued and display a Permanent or Temporary SAN AOA Vehicle Permit.
 - B. The vehicle being escorted shall display a SAN AOA Visitor Vehicle Permit, unless otherwise authorized by Airport Security or Airport Operations.
 - C. The driver of the vehicle performing the escort shall have a valid SAN ID badge w/ Escort Authority and valid SAN AOA Driver endorsement.
 - D. Approved escort procedures shall apply to the driver and the vehicle being escorted at all times, as authorized by Airport Security or Airport Operations. Drivers of vehicles being escorted are required to display a SAN Visitor ID badge. Vehicle escorts are "one-for-one" unless a deviation is approved by Airport Operations specifically for that escort situation.
 - E. THE DEFINITION OF A VEHICLE ESCORT IS: IN VIEW AND UNDER THE POSITIVE CONTROL OF THOSE RESPONSIBLE FOR THE ESCORT AT ALL TIMES.

2. The movement, positioning and parking of exceptionally large, tall, or slow vehicles (i.e. a large crane, vehicles carrying an oversize load, backhoes, earth movers, dump trucks, etc.) shall be coordinated with and authorized by Airport Operations.

VIII. CHIEF OF SECURITY

1. Based upon the complexity of the project or contract, the length of the project or contract and the number of employees involved, Airport Security shall specify whether or not the Contractor shall employ a full-time, dedicated Chief of Security. Typically, the Contractor shall be required to provide a Chief of Security serving as a point-of-contact for all security matters. Under all circumstances, the Chief of Security must have supervisory authority; and not be a general non-supervisory employee or laborer.
2. If required, the Contractor shall assign one employee to the full-time position of "Chief of Security." This individual shall be identified to and approved by the Manager, Aviation Security & Public Safety or Airport Security Coordinator prior to the start of any work on the airport. The Contractor's Chief of Security shall work closely with the, project or contract manager and the Manager, Aviation Security & Public Safety or Airport Security Coordinator to ensure that all airport security requirements are implemented and explicitly followed.
3. Responsibilities of the Contractor's Chief of Security include, but may not be limited to:
 - A. Knowledge of Transportation Security Regulations (TSRs) pertaining to airport security and the SAN Airport Security Program (ASP).
 - B. Knowledge of Airport Security, TSA, Harbor Police, and Airport Operations security enforcement procedures.
 - C. Managing the scheduling of employees with the ACO for the TSA-required Fingerprint-Based Criminal History Access Investigation and STA; and issuance of SAN ID / Sterile Area Access ID badges.
 - D. Ensuring the procedures for control, issue, use and retrieval of SAN ID / Sterile Area Access ID badges, and SAN AOA Driver endorsements are followed.
 - E. Ensuring the procedures for control, issue, use and retrieval of SAN Visitor ID badges are followed.
 - F. Ensuring the procedures for control, issue, use and retrieval of

Permanent, Temporary, and Visitor SAN AOA Vehicle Permits are followed.

- G. Ensuring the procedures for control, issue, use and retrieval of keys and other access media are followed.
- H. Ensuring all applicable security education and AOA driver education training is administered and all applicable records are complete and accurate. Contractor employee or subcontractor employee security training (initial and recurring) requirements should include, but not be limited to:
 - 1. Proper control, use, display and protection of the SAN ID / Sterile Area Access ID badge.
 - 2. Badge recognition, area authorization, and expiration (color coding and expiration dates).
 - 3. Procedures for reporting lost, stolen and damaged ID badges.
 - 4. Condition of Custody (Escort) procedures.
 - 5. Key control procedures.
 - 6. Vehicle authorization and AOA driving procedures.
 - 7. Challenge procedures (making and responding to).
 - 8. Protection of the airport perimeter and perimeter gate control.
 - 9. Protection of Secured, AOA, and Sterile areas.
 - 10. Protection of secure, terminal area doors and gates.
 - 11. Restrictions on divulging and non-disclosure of airport security related information.

IX. PENALTIES / FINES

Each violation of the SAN Airport Security Program subjects the Contractor to a potential civil penalty assessment by the TSA. Civil penalties are assessed at a minimum of ten thousand dollars (\$10,000) for each violation occurrence. Fines levied against SAN due to the actions of a Contractor, or any of its employees or subcontractors, will be withheld from the Contractor's final payment or reimbursed to SAN by the Contractor, as appropriate.

Violations of the San Diego County Regional Airport Authority Code, Airport Rules and Regulations, SAN Airport Security Program, or TSA regulations by ANY individual, regardless of badgeholder status, shall be subject to the provisions of the Airport Violation Notice (AVN) Program (Attachment 3 to this Exhibit – or as amended) or criminal prosecution, as appropriate.

These Security Instructions are intended to cover the majority of contracts performed at SAN and do not include all measures that may be required.

Attachment 1

TOOL INVENTORY VERIFICATION PROCEDURES

(November 5, 2009)

POLICY AND INTENT:

It is the policy and intent of the following procedures to allow workers to have the necessary tools with them while working within the Sterile Areas of San Diego International Airport (SDIA) while complying with Transportation Security Administration (TSA)-required security measures.

PURPOSE:

The purpose of these procedures is to provide Contractors, other construction and maintenance workers with guidelines allowing them to bring their needed tools into the Sterile Areas of SDIA's terminal buildings and to account for these tools during their work in said areas, via a Tool Inventory and Verification (TIV) method.

APPLICABILITY:

The following procedures apply to workers whose activities are intended to take place within the Sterile Areas of SDIA's terminal buildings.

A Sterile Area is any area within a terminal building past a security checkpoint.

“TIV” PROCEDURES:

1. Before entering the Sterile Area:
 - A. The worker shall complete the appropriate sections of a Tool Inventory Verification (TIV) form (see attached sample) in accordance with the instructions contained therein.
 - B. Approximately 15 to 30 minutes before start time, the worker shall contact his/her designated “Inspector” to agree on a place and time at which the TIV Verification will take place.
 - C. The Inspector will verify that the tools listed by the worker in the “Entry” column of the form are actually those shown to him by the worker, then complete the appropriate sections of the form.
 - D. The Inspector will retain the form and allow the worker to enter the Sterile Area in accordance with currently applicable Contractor Access guidelines. The worker shall enter the Sterile Area and proceed directly to

the work area.

NOTE: Refer to “Contractor Access” guidelines Attachment 2 of this Exhibit and comply with the applicable restriction level specified herein.

2. Before leaving the Sterile Area:

- A. The worker shall make sure that he/she is in possession of all the tools he/she brought with him/her into the Sterile Area and which he/she has listed on the Tool Inventory Verification form. He/she will complete the “Exit” column of the form.
- B. The worker shall contact his/her designated “Inspector” to agree on a place and time at which the “exit” TIV Verification will take place.
- C. The Inspector will verify that the tools listed by the worker in both “Entry” and “Exit” columns of the TIV form are identical, and will allow the worker to exit the Sterile Area, if there is a complete match between the “Entry” and “Exit” columns of the TIV form.

CAUTION Should any information contained in the “Exit” column not identically match its corresponding information in the “Entry” column, the Inspector will stay with the worker and **contact the Manager, Aviation Security & Public Safety (MASPS) or Director, Airside Operations (DAO) immediately.** (An Airport Operations Supervisor on-duty may be called upon to assist with establishing this contact.)

- D. In either case, the Inspector will file the form for future reference for a period of seven (7) days.

ATTACHMENT:

Attached is a sample of the Tool Inventory Verification (TIV) Form. Read its instructions before filling it out.

The above procedure, dated November 5, 2009, is effective upon receipt, and remains in effect until further notice. Please direct all questions to the Manager, Aviation Security & Public Safety or Director, Airside Operations.

Attachment 2

CONTRACTOR ACCESS

(Procedures modified on 11/5/2009)

AIR OPERATIONS AREA (AOA)

LOCATIONS DESCRIPTORS:

- “A” = Within 100 ft of any parked air carrier passenger aircraft.
- “B” = Within 100 ft of any other parked aircraft, e.g. air cargo, general aviation, government aircraft, etc.
- “C” = Anywhere within the AOA but outside of areas “A” or “B” above.

LEVEL 1 RESTRICTIONS: Applicable to location “C”.

1. Access to the AOA granted to Contractor’s badged personnel, properly “Visitor”-badged persons and properly identified vehicles only.
2. Must remain within designated work area, must use designated access routing and access gate only.
3. Must notify AOS office before entering or leaving AOA.

LEVEL 2 RESTRICTIONS: Applicable to activities within location “B” or while transiting through (but not working within) location “A”.

1. Access to the AOA granted to Contractor’s badged personnel, only (without authority to escort non-badged or “Visitor”-badged persons) and properly identified vehicles only.
2. Must remain within designated work area, must use designated access routing and access gate only.
3. Must notify AOS office before entering or leaving AOA.

LEVEL 3 RESTRICTIONS: Applicable to activities within location “A”.

1. Access to the AOA granted to Contractor’s badged personnel, properly “Visitor”-badged persons, and properly identified vehicles only, and only when escorted by properly badged Authority or Authority-consultant personnel.
2. Must remain within designated work area, must use designated access routing and access gate only.
3. Must notify AOS office before entering or leaving AOA.

NOTE: Airline personnel displaying a SAN-issued “Visitor” badge may be escorted by SAN-ID-badged airline personnel with Escort Authority into SAN-AOA for company business and within company area only.

INSIDE Terminals & Rooftop

1. Areas open to the public (before the checkpoints):

NO RESTRICTION.

2. Areas beyond the checkpoint:

ALL PERSONNEL MUST BE BADGED, SECURITY-SCREENED, HAVE AUTHORITY OF ESCORT BUT ONLY IF ESCORTEES DISPLAY "VISITOR" BADGES AND HAVE BEEN SECURITY SCREENED. DURING THE PERIOD WHEN THE CHECKPOINT IS CLOSED, ONLY PERSONNEL UNDER ESCORT BY AUTHORITY OR AUTHORITY-CONSULTANT PERSONNEL MAY ENTER THE STERILE AREA WITHOUT SECURITY SCREENING.

3. Rooftop:

- All personnel must be badged; all other persons must display a "Visitor" badge and be escorted.
- All personnel must remain within designated work area, must use designated access point only.
- The AOS office must be notified before accessing or leaving the roof.

DEFINITION OF "ESCORT"

- Each "escorter" must be properly badged (w/ Escort Authority); and shall not "escort" more than five (5) "escortees".
- Escortee must be within 25 ft of escorter unless compliance with this distance violates OSHA or other safety regulations. In this case, use the shortest safe distance to comply with the regulations.
- Escorter has positive control of escortee, (i.e. escortee able to receive, understand and comply with escorter's instructions).

Attachment 3

AIRPORT SECURITY VIOLATION NOTICE PROGRAM

PURPOSE: To develop and ensure continuous security awareness and compliance among San Diego International Airport (SDIA / Airport) employees, tenants, vendors, and contractors.

APPLICABILITY: All persons in possession of an airport issued identification badge (SAN ID / Sterile Area Access ID) or other airport authorized identification medium as outlined in the Authority Code (Code), Airport Security Program (ASP) or Airport Rules and Regulations (ARR), members of the Airport Security Participant Program (Participant), tenants of SDIA, and contractors/vendors/visitors of any tenant of SDIA.

SCOPE: The Airport Security Violation Notice (AVN) Program is designed to specifically address non-compliance by individuals with security regulations as outlined in the ARR and ASP. Any violation not attributable to an individual, shall be addressed to the senior representative responsible for the area in which the violation occurred.

An AVN may be issued by:

Airport Operations Specialists (AOS)
San Diego Unified Port District Harbor Police (HPD)
Manager, Aviation Security and Public Safety (MASPS)
Airport Security Coordinator (ASC)
Director, Airside Operations (DAO)

for failure to comply with **any** policy, procedure, or regulation contained within the ASP, ARR, Participant Manual, Tenant Advisory (TA) of a regulatory nature, or San Diego County Regional Airport Authority (SDCRAA) Code as related to airport security.

The AVN consists of a written notice issued to the offender, as well as a copy to the employer. The notice (see attached) contains at a minimum:

1. Violator Name,
2. SAN ID / Sterile Area Access ID Badge Number (if applicable),
3. Employer,
4. Violation, and
5. Date of Violation.

Upon issuance of an AVN, the employee will be advised that this, and future violations, may result in:

1. Monetary Penalties
2. Suspension and/or revocation of the employee's SAN ID
3. Issuance of a Notice to Appear (NTA) Citation
4. Arrest and prosecution as appropriate

Airport Violation Notices will be recorded in a computerized database. Violations will be tracked cumulatively and across companies. Three violations may result in suspension, up to permanent revocation, of the individual's SAN ID / Sterile Area Access ID and access privileges to restricted areas at SDIA. This revocation shall apply universally at SDIA. An employee of an organization who has access privileges revoked shall lose access privileges with any other employer at SDIA. **Revocation of an employee's access privileges is permanent.**

SAN ID / Sterile Area Access ID suspensions are a minimum of ten (10) calendar days. The employee's suspension shall begin the Monday following: (1) the expiration of the appeal period; or (2) an unsuccessful appeal. During the suspension, the individual shall be denied access to restricted areas of SDIA; even if appropriate escort is provided. Individuals violating, or assisting in the violation of, this suspension may lose access privileges to SDIA for a minimum of 90 days; up to permanent revocation of the individual's access privileges. Any individual on suspension discovered within any non-public restricted area, Secured Area, Security Identification Display Area (SIDA), or beyond any SDIA Access Control Portal leading to a non-public area, may be removed for trespassing.

During the suspension, the employee must attend security training administered by the Airport. Training is typically administered by the Airport every Tuesday at 2:00 p.m. and Thursday at 8:00 a.m. at the San Diego County Regional Airport Authority offices, 3rd Floor Commuter Terminal, SDIA.

Should an individual's appeal start date or end date, suspension start date or end date, or recurrent training date fall on an Authority holiday, the individual will be advised at the issue / appeal / disposition of the AVN what effective dates apply.

Any suspension or revocation of the SAN ID / Sterile Area Access ID badge may be appealed in writing to the Director, Aviation Security and Public Safety, within five (5) weekdays of the Director's notification letter or Administrative Notice of Violation to the employee/employer concerning the infraction. The following describes some of the consequences when an individual breaches security requirements, which may also be found in the Airport Rules and Regulations (AAR) and Authority Code.

ARR SECTION	ITEM	1st/2nd/3rd OFFENSE
2.19.A	Improper entrance, or allowing unauthorized entrance, into a Restricted Area – Piggybacking and Tailgating	10-Day Badge Suspension / 20-Day Badge Suspension / Badge Revocation
2.20.A	Failure to Properly Display SAN ID / Sterile Area Badge	10-Day Badge Suspension / 20-Day Badge Suspension / Badge Revocation
2.20.A	Failure to Display SAN ID / Sterile Area Badge	10-Day Badge Suspension / 20-Day Badge Suspension / Badge Revocation
2.20.B	Improper Personnel Escort Procedures	10-Day Badge Suspension / 20-Day Badge Suspension / Badge Revocation
2.20.C	Use of Another Person's SAN ID / Sterile Area Badge	Immediate Badge Revocation
2.20.C	Permitting Use of One's Own SAN ID / Sterile Area Badge by Another Person	Immediate Badge Revocation
2.20.F	Lost SAN ID / Sterile Area ID	\$25 / \$15 Per Occurrence; After 3 rd Loss, Badge Revocation
2.21.B	Unauthorized Testing, Tampering, or Vandalism of Checkpoint, Screening, or Security Systems	Immediate Badge Revocation
2.22.C	Failure to Remain at an Activated Alarm Door for Law Enforcement Response	10-Day Badge Suspension / 20-Day Badge Suspension / Badge Revocation

