

Congress of the United States
Washington, DC 20515

March 5, 2014

Hon. John S. Pistole
Administrator
The Transportation Security Administration
601 12th St S
Arlington, VA 22202

Dear Administrator Pistole:

It has been conveyed to us that the Transportation Security Administration is undertaking a “hub and spoke realignment,” and that as part of this realignment, the Buffalo-Niagara Falls International Airport (BNIA) is being made a spoke to the Albany International Airport (ALB). We write today not to object to the generic concept of achieving cost savings through administrative efficiencies, but specifically to object to the decision to locate the FSD for all of Upstate New York’s airports in Albany, an airport half as busy at Buffalo, and further to request that the decision to make Buffalo a spoke to Albany’s hub be reviewed and ultimately reversed.

Any analysis of this problem must begin with the inescapable fact that Buffalo is a much busier airport than Albany. Consider the following data:

2013 Passengers ¹		
	BUF (rank)	ALB (rank)
Arrival	2,548 k (55)	1,185 k (81)
Departure	2,554k (55)	1,181 k (82)

It has been conveyed to our offices that TSA structures its airport operations based on a variety of factors, including passenger volume and the number of flights. If these were the primary considerations, the data could clearly favor Buffalo. Faced with this objection, TSA staff indicated that the decision was made to make Albany the hub because it is the state capital and because it is more centrally located geographically. Putting aside the fact that Albany is no more centrally located relative to the other three principal upstate airports than Buffalo, it is significant to note that in every other proposed hub and spoke relationship around the country the proposed hub is larger than the proposed spoke, even when the spoke is a state capital.² Additionally, there is no valid argument for a bias toward location of the FSD in the state capitol. If the goal is to have the FSD co-located with a larger nexus of federal law enforcement presence, Buffalo is clearly in the stronger position. Buffalo has more FBI agents than Albany³, and, consistent with Buffalo’s rank as the third largest land port of entry,⁴ and the busiest on the Canadian border, Buffalo has a far more substantial CBP, Border Patrol and Coast Guard presence than Albany.

¹ USDOT-RITA-BTS maintains a website regarding each airport, from which these statistics were taken.

² Memorandum from Susan Hasman, OSO to FSDs, 2/19/14.

³ <http://www.justice.gov/oig/reports/FBI/a0439/ch2.htm>

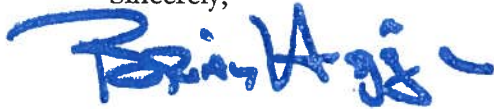
⁴ http://transborder.bts.gov/programs/international/transborder/TBDR_BC/TBDR_BC_QuickSearch.html

Decisions about where to place the FSD, like other TSA staffing decisions, are supposed to be based on “Airport Complexity.”⁵ One of the factors contributing to the complexity of the TSA operations at Buffalo, which has no analogous factor at Albany, is the close proximity of the Buffalo airport to the Canadian border and to the greater Toronto area, a metropolitan area approximately the size of Los Angeles. Because of this, and because Toronto’s Pearson International Airport is an expensive airport, approximately 40% of the passengers at the Buffalo Airport are Canadians or other foreign nationals. The fact that TSA in Buffalo has conducted drills and engaged in other coordination with the Canadian Border Services Agency and other Canadian authorities exemplifies the enhanced complexity associated with Canadian proximity.

In addition to objecting to the specific decision which was made and to ask for its reversal, we are compelled to point out deficiencies in the manner in which this initiative has been and is being carried out. The “Communication Plan” in the “Guiding Principles, Business Rules, and Procedures for Hub and Spoke Realignment Initiatives” has been disregarded in several respects, and the communication to staff has been inconsistent and contradictory.

Again, we protest the proposed subordination of the TSA operation in Buffalo to the TSA operation in Albany, and we ask you to reconsider this decision.

Sincerely,



Brian Higgins
Member of Congress



Chris Collins
Member of Congress

⁵ TSA, *FSD Staffing Guide*, 2/2014, p. 3