



4<sup>th</sup> February 2013

Austrian Federal Ministry for Transport  
Radetzkystrasse 2  
1031 Vienna  
Austria

Dear Sir, Madam,

It was brought to IATA's and AEA's attention that the recent amendments to the national regulation on air transport include a provision to re-introduce the verification of the passengers' identity at the boarding gate.

This amendment of paragraph 134(3) is based on the interpretation of Article 20 of EU Regulation 996/2010, which reads as follows: "[airlines shall implement procedures which allow for the production] as soon as possible, and at the latest within two hours of the notification of the occurrence of an accident to the aircraft, of a validated list, based on the best available information, of all the persons on board;"

Based on the discussions in the European Parliament, in the Council of the European Union, and on a recent confirmation of the European Commission, the common understanding of Article 20 is that airlines have to ensure that the passenger list is as accurate as possible on the basis of the information available – but by no means meant the re-introduction of an ID check at the gate.

IATA and AEA would therefore urge the Austrian authorities to reconsider its proposed interpretation of this Article 20 to re-introduce ID verification at the gate. Airlines have other means to ensure that they can produce a validated list of passengers, either through their passenger manifest or their reservation systems.



The re-introduction of ID checks at the gate does not have any added-value from a safety perspective nor from the perspective of accident investigation and goes against the new business processes that the airlines are now trying to introduce, specifically for intra-Schengen flights, where self-boarding through automated gate is made possible.

IATA and AEA very much hope that these comments can be taken into consideration in the revision of the Austrian regulation on air transport and remain at your disposal to further discuss this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Monique DE SMET', with a large, sweeping flourish at the end.

Monique DE SMET  
Regional Director, Europe, IATA

A handwritten signature in blue ink, appearing to read 'Athar Husain-Khan', with a large, sweeping flourish at the end.

Athar Husain-Khan  
Acting Secretary General, AEA

Cc: Mathias JAKOBI, Area Manager, Central Europe, IATA