EXHIBIT 16
CHECKPOINT OPERATIONS GUIDE (COG)

STANDARD OPERATING PROCEDURES

Produced by

Air Transport Association of America

and

Regional Airline Association

in cooperation with

Federal Aviation Administration

and

Aviation Security Contractors Association

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PREFACE

The CHECKPOINT OPERATIONS GUIDE (COG) is designed to provide technical and administrative guidance for passenger screening personnel.

The information in the guide is a synopsis of standards established by the Federal Aviation Administration. The guide also contains recommendations developed by the Air Transport Association, the Regional Airline Association, and the Aviation Security Contractors Association about checkpoint operations.

The generic term passenger is used to indicate any person passing through a checkpoint; the term supervisor is used to identify the person of authority on-duty at the checkpoint at a given time. The term bag is also used generically to denote any parcels or luggage that a passenger presents for inspection.

The COG is as inclusive as possible, however some situations do not lend themselves to specific procedures. Screeners, supervisors and managers must keep in mind that some day-to-day situations will occur that require on-site decisions. NO ACTION should ever be taken that could compromise the aviation security process. All problem situations should be resolved by the most experienced screener or supervisor available and/or referred to the responsible airline.

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The material contained in the COG is RESTRICTED and the use of this material is limited to security screening personnel with an operational need to know such information. Nothing in the COG should be disseminated to unauthorized personnel.
CONTRABAND

A screener may observe something that, although it is not included within the primary mission of the screening process, is suspected to be illegal (i.e. controlled or illegal drugs, drug paraphernalia, large quantities of cash, etc.). These articles are referred to as CONTRABAND.

The screener should not attempt to hold the passenger or confiscate the items. However, airlines are prohibited from knowingly transporting contraband. The screener making the discovery should immediately notify a supervisor and provide a description of the passenger and their direction of travel. The supervisor should notify the appropriate authorities.

GUIDELINES FOR ITEMS THAT MAY NOT PASS INTO THE STERILE AREA

RESTRICTED ITEMS

Restricted items are things or substances that pose a potential danger. Even though they are not firearms or explosive devices, they are not permitted in the passenger cabin of an aircraft. (i.e. toy or replica guns, martial arts devices, swords, sabers or hunting knives, etc.) The supervisor must be notified if an item in this category is encountered.

Passengers may be given the option of having these items transported as checked baggage.

HAZARDOUS MATERIALS

HAZARDOUS MATERIAL, often referred to as "HAZMAT" are materials that are dangerous to transport on-board an aircraft. (i.e. flammable liquids and matches in large quantities, aerosol deterrent devices such as Mace, acids or other corrosives, containers of propane gas, fireworks, bleaches and toxic materials such as poisons or insecticides)

Passengers may not take items in this category on an airplane as checked baggage without the express permission of the airline.
Items NOT allowed to enter the sterile area:

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<th>ITEM</th>
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<td>Gun powder</td>
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<td>Hammers</td>
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<td>Hand grenades</td>
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<td>Hatchets</td>
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<td>Hunting knives</td>
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<td>Ice axe / Ice pick</td>
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<td>Insecticides</td>
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<td>Kerosene</td>
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<td>Knives (blades over 4&quot; or menacing)</td>
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<td>Kubatons</td>
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<td>Lighter fluid</td>
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<td>Mace</td>
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<td>Martial arts devices</td>
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<td>Matches (large quantity)</td>
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<tr>
<td>Meat cleavers</td>
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<td>Nunchucks</td>
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<td>Oxygen tanks</td>
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<td>Paints</td>
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<td>Paint thinner</td>
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<td>Pellet guns</td>
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<td>Pepper spray</td>
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<td>Pistols</td>
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<td>Plastic explosives</td>
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<td>Portable power drills</td>
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<td>Portable power saws</td>
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<tr>
<td>Radioactive material</td>
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</table>
WEAPONS AND EXPLOSIVE DEVICES

Items in this category (i.e. flare pistols, revolvers, long guns, automatic weapons, long bladed knives, explosives and explosive devices, etc.) may not enter the sterile area. The checkpoint supervisor, airport police, airline GSC and screening company management (if applicable) must be notified if an item in this category is encountered.

Items on the following chart may not be allowed to enter the sterile area. In some cases it may be difficult for screeners and/or supervisors to make a clear-cut determination as to the category of a specific item. Knives with blades under 4 inches, such as Swiss army knives, scout knives, pocket utility knives, etc. may be allowed to enter the sterile area. However, some knives with blades under 4 inches could be considered by a reasonable person to be a "menacing knife" and/or may be illegal under local law and should not be allowed to enter the sterile area. ANY QUESTIONABLE ITEM SHOULD BE REFERRED TO A GSC.
EXCEPTIONAL SCREENING

The airline GSC may direct the use of intensified security procedures. This is most often due to a SECURITY INFORMATION CIRCULAR or SECURITY DIRECTIVE issued to the airline by the FAA or intelligence developed by the airline security department.

Screeners may be required to verbally question passengers during screening. The questions are designed to determine if passengers are absolutely certain of the contents in their carry-on baggage.

Additional procedures may include subjecting articles to another x-ray examination both in the horizontal and vertical positions; and/or requiring passengers to remove batteries from electric or electronic devices. The batteries may either be checked to the destination or surrendered at the checkpoint.

SPECIAL SCREENING SITUATIONS

PRIVATE SCREENINGS

Passengers carrying unusually valuable or sensitive materials may request a PRIVATE SCREENING. The passenger and/or hand-carried items will be inspected out of view of other passengers. This procedure will vary depending on the physical design of the screening point, but generally it will be in a closed room or office. The standard procedure requires that two screeners and/or supervisors be present during a private screening.

ARMED FEDERAL, STATE, and LOCAL LAW ENFORCEMENT OFFICERS

Armed federal, state or local officers, traveling as passengers, must present documentation to the checkpoint supervisor. After verification they may be allowed to pass through checkpoints.
SPECIAL PROCEDURES - 6

Armed federal, state or local officers who are not passengers, are allowed to pass through the checkpoint upon presentation and verification of credentials by the checkpoint supervisor.

SPECIAL NOTE: Local requirements regarding specific procedures may vary from airport-to-airport. If applicable, details regarding these procedures should be placed in Section 10, SITE SPECIFIC.

PASSENGERS UNDER ESCORT

Certain dignitaries, VIP’s, witnesses under protective custody or prisoners in-transit may be escorted by either armed or unarmed federal, state or municipal escorts. Armed LEO escorts must be processed as previously outlined. If the person(s) being escorted is not cleared by undergoing a PRIVATE SCREENING, he or she must be processed using standard screening procedures.

SPECIAL NOTES:

Dignitaries being escorted by the U.S. Secret Service, and their carry-on items are considered to have met FAA screening requirements.

Security personnel accompanying foreign dignitaries must have airline documentation if they are traveling armed. They should be processed in the same manner as other armed LEO’s.

TO VERIFY A PHOTO ID YOU MUST ENSURE THAT THE ID:

- has a full-face photo that matches the appearance of the passenger.
- shows the name of the law enforcement organization.
- has the name and signature of the passenger.
• If there is an alarm from the sample taken of the bag and/or any electrical or electronic items found within the bag, the supervisor should:

1. Determine if the person is a passenger, and find out his or her name and flight information. (if applicable)

2. Notify the GSC of the nature of the alarms and the passenger’s name and flight information. (if applicable)

3. Direct the screener to perform a whole bag search in the presence of the passenger.

If the bag search does not reveal a deadly or dangerous item, the GSC will make the decision as to whether the passenger’s checked baggage requires additional screening and if the LEO should be notified.

• If the passenger to whom the bag belongs leaves the area prior to clearance of the bag, the airline GSC and LEO must be notified immediately. Further inspection or testing of the bag is prohibited unless authorized by a LEO.

• In situations when an alarm cannot be resolved, the bag must not be allowed to enter the sterile area unless it is cleared by a QUALIFIED GSC or a LEO in accordance with local procedures.
SPECIAL PROCEDURES - 6

- If the object that caused the alarm on the EDS, causes a trace alarm the airline GSC and a LEO must be notified immediately. Further screening of that object is prohibited unless authorized by a LEO.

Electronic or electrical items found inside of the bag must be processed as if they were separate, individual items.

If the person to whom the item belongs leaves the area prior to clearance of the item a GSC and a LEO must be contacted immediately.

All personnel involved in EDS screening must understand the local procedures for requesting law enforcement support. If a LEO is summoned, he or she will assume exclusive control of the unresolved item until it is cleared. Further search or testing of the item is prohibited unless authorized by a LEO.

Final resolution of all unresolved alarms will be made by the LEO in accordance with local procedure.

SPECIAL NOTES - FILM

“Cat Scan” based EDSs can damage unprocessed photographic film. Passengers must be advised that all unprocessed film should be removed from their baggage.

Passengers who remove the film before EDS processing may not return the film to the luggage after the baggage has been cleared.
CHECKPOINT CONTRACTOR MANAGEMENT RESPONSIBILITIES

FULL-DUTY SCREENER CERTIFICATION REQUIREMENTS

To perform unlimited screening duties all personnel must:

- be 18 years or older.
- have no criminal convictions.
- pass a drug test.
- have a high school diploma or equivalent.
- be able to read, understand and carry out instructions in English.
- be able to read identification badges, credentials and labels on items presented for screening.
- be able to issue verbal directions in English.
- be a citizen of the United States or possess necessary authorization from the Immigration and Naturalization Service.
- be able to sit, stand, lift, and/or bend throughout a shift.
- be able to lift, carry and/or hold passenger baggage.
- be able to perceive each color used on a color x-ray and metal detector visual alarm.
- be able to hear and respond to the spoken voice and audible alarms generated by metal detection devices in the checkpoint environment.