

Barbara D. Palmer.

CAPALABA. QSLND 4157

June 19th 2008

The Department of Infrastructure, Transport,
Regional Development and Local Government.

G.P.O. Box 594

CANBERRA. A.C.T. 2601

Dear Sir,

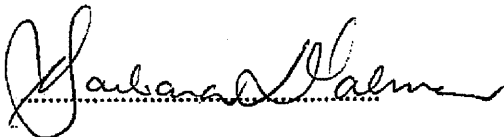
Re – Submission. "Towards a national Aviation Policy Statement"

Enclosed please find a Submission in reference to the "Towards a National Aviation Policy Statement", Issues Paper April 2008.

As the Aviation Industry is such a unique and complex Industry, it is hoped that there were will be a number of Submissions received.

Thankyou for the opportunity to submit this paper.

Yours Sincerely,

A handwritten signature in cursive script, appearing to read 'Barbara D. Palmer', written over a horizontal dotted line.

Barbara D. Palmer

ARN 034452

INTRODUCTION

Since the writing of the issues paper – April 2008 “Towards a National Aviation Policy Statement” with a forward from the Minister for Infrastructure, Transport, Regional Development and Local Government – The Hon. Anthony Albanese MP, there have been a considerable number of changes in the Aviation Industry. One only has to look in daily papers, and especially in The Australian of a Friday.

The changes have occurred due to a number of factors. Many of these changes have taken place in the area of Carriage of Passengers (pax). This has been brought about by increased fuel prices, unhappy engineers, cancellation of scheduled routes, withdrawal of flights from many ports, weather patterns, Crew changes, Maintenance requirements, Management decisions, to name but a few.

The Aviation industry is a very unique and complex Industry and part of our everyday life.

Mr and Mrs. Public do not have any idea, or really want to understand the “Why, How, the Happenings” that enables them or has enabled them to enjoy “cheaper fares”, be it for travel domestic or international. They have had a taste of the “joys of flying”. Enjoying the less time it would take them to go by other means of transport, but with a very high degree of Safety. Arriving at their destination safe and relatively rested.

Safety is maintained due to a lot of sweat and tears by many. Flight crew, pilots / cabin crew, ground staff, baggage handling. staff, security staff, management, training, engineers. Air Traffic Controllers, refuellers, Civil Aviation Safety Authority, (C.A.S.A.) AirServices Australia, Flying Schools, Aero clubs. There are many other organisations that are involved in the Aviation Industry.

Many Committees and Associations are run by volunteers, who take on the responsibility, very seriously, because they “want to fly” or be involved in flying, and see the Industry improve and grow.

Everyone one of the services provided to the Aviation industry is made up of people, Human beings. Nothing can be done without human input.

All of whom are important.

Page 2.

The Australian Aviation Industry.

1.1 International 1.2 Domestic Services

Surely it is best to speak to the operators domestically and internationally to see what their forward planning programmes might be.

Whether an operator decides to purchase new aircraft, second hand aircraft or lease aircraft is a decision that they can only make. It is important however to have communication with various Government departments be it State or Federal. i.e. Civil Aviation Safety Authority (C.A.S.A.) Local governments. Work together to achieve the end result.

Increasing services by Foreign airlines, they most certainly would have to maintain their aircraft to the Australian Safety standards.

We are fortunate in that Australia belongs to the International Civil Aviation Organisation (I.C.A.O) with its many Committees, resources and meetings worldwide. These seminars/meetings are attended by many professionals in the Aviation Industry, at which Australia's concerns on many issues i.e. Safety, can be put forward.

Attracting foreign and Australian airlines to Australia's four major gateways, Sydney, Brisbane, Melbourne, Perth, and smaller international airports, surely would be in relation to the economic climate and whether passenger numbers increase in and out of Australia.

Not knowing what is meant by "open cargo and dedicated cargo services. What cost effective strategies could be employed to avoid delays in the transport of time-sensitive cargo" – it is difficult to make a comment. If the "time sensitive cargo" is live stock and food, then surely the manufacturers would look into the best way of transporting goods to their satisfaction.

If the cargo is overnight freight be it domestic or international – documents - banks, the operators of those particular services have had many years of experience in the "how's and whys". But again the public place expectations and demands that in many cases are not practical, and again the safety issue is paramount. i.e. flight and duty times for one must be adhered to.

Delays, there will always be delays, that is part of life. Some seen, some not.

We humans have come to expect things "yesterday". We need to build into our lives "buffer zones" for these unexpected happenings.

1.3. Regional and General Aviation

What should be and could be are two different things. !!

On some regional routes, people, the community – the Mr. & Mrs. Public, Local councils etc., over the years have said “We want a jet service”. Are the runways, taxiways, apron areas etc., suitable for whatever type of aircraft to be used for that particular route? They have no idea, and when it is explained to them, they still do not understand what is involved. It needs to be a joint decision by the various parties involved and again communication.

Regular Public Transport (RPT) Regional services provided, are into Security Controlled Airports. In many cases this has increased the cost to the local Councils. The airports are usually owned and operated by the Local council/s. The increased \$ cost of providing the facilities has placed many councils and operators in a difficult financial situation. This then brings in the thinking of commercialisation of airports, and usually they have nothing to do with the Aviation industry, and then complain for whatever reason, once they have established the business.

The Australian Airports Association meets each year....owners of airports from all the States and Territories. It is hoped that a Submission from them would have been received by the Board, Committee, or Individual who is overseeing the **Issues Paper**.

Security at Regional airports - Those who receive RPT services have had added security in the last few years, new high fencing, gates with security pads for access. Australian Security identification Cards (ASIC) have had to be applied for by regular users of the airports.

Ageing aircraft - The high standard of maintenance which is part of Australia’s safety history is perhaps one of the reasons why the aircraft of 30 years young are still flying. The manufacturers have spent millions of dollars on research and have Aircraft maintenance scheduling which has worked well over the life of an aircraft.

There comes a time when things are no longer able to be “fixed” and that is a decision which is made by the owner/operator of the aircraft in question. That decision is usually made in conjunction with maintenance and regulatory bodies and the owner’s financial situation to carry out the necessary maintenance or changes required.

1.4 Addressing skills needed in the Aviation Industry

It doesn’t matter what industry a person wishes to be a part of. It is the love of it, the desire, the burning to be a part of it. The “skill” comes as ones knowledge and experience increase.

If one is wanting to learn to fly, the first instructor is someone who will always be remembered by the student. The instructor will have a lasting impression on the student. The instructor may not necessarily remember each student. The instructor may not have a degree in Teaching, but has the desire to teach, and pass on their knowledge and experience, which has become “a skill”

Instructing for many Commercial Pilots over the years has been “a means to the end” That end being able to be in the Left/Right hand seat of an Airline be it Regional, Domestic, International, Corporate flying.

A bit of history.....

In the late middle to late 1960's the then Department of Civil Aviation encouraged many young pilots to apply to the Department for various Scholarships – Commercial licence and Instructor Ratings. This enabled those who were successful to continue their flying careers that perhaps would not have been able to do so otherwise.

Aviation Infrastructure

Airport Planning and Development

It is hoped that commonsense would prevail in approval for non Aviation businesses having access to Airports. Thus cutting back on the complaints from whoever regarding "noise".

But more importantly that the planners make themselves aware of the requirements and restrictions when developing near any airport.

There have been a number of situations over the years where development have taken place, and has encroached on required regulations for departure and arrival patterns. (A runway had to be realigned, due the building of a very high grain silo.)

Comment in relation to **aircraft noise**. The aircraft Manufacturers are continually looking at and building engines that will produce less noise. Jet engine aircraft are not always the aircraft that make the most noise.

In the current climate of security requirements to combat terrorism, why create a situation that can be avoided. The present airports that are operated under a **Joint Defence and Civil** situation fine, but don't approve any more.

2.2 Air Traffic Management.

Keep communicating with the people who have the information on such matters, and encourage involvement, training with those in the industry who will be actually using the updated technology.

There are a number of Committees presently sitting with and alongside CASA, people who have gained much experience and knowledge over many years in the industry.

Just to mention a couple:-

Standards Consultative committee (SCC) -

Airspace and Infrastructure Users Group

Aviation Safety

3.1 Safety regulation and regulatory reform

Please refer to Page 16 Paragraph 4.

It is mentioned Dr. Allan Hawke was head of a Taskforce.

Upon looking into the CASA web site have found information pertaining to the that Task force

Quoting from the CASA web site. "Changing the Rules – Aviation Regulation Review Taskforce"

Quoting -

The Aviation Regulation Review Taskforce was established in April 2007 by the Deputy Prime Minister and Minister for Transport and Regional Services, the Hon Mark Vaile MP, following discussions with the Chief Executive Officer of the Civil Aviation Safety Authority (CASA), Mr. Bruce Byron AM.

Dr. Allan Hawke, chancellor of the Australian National University and former Departmental Secretary, is the Taskforce Chair. Mr. Byron, Mr. Dick Smith, AO. Mr. Jeff Boyd (Chief Executive Officer, Brindabella Airlines), Mr. Rob Graham (aviation industry consultant and Chair of CASA's Standards Consultative Committee) and Mr. David Cox (Executive General Manager Engineering Qantas) are the other members.

The Taskforce was created in response to concerns from some members of the industry that CASA's Regulatory Reform Programme was taking too long and that the regulations were still too prescriptive and were not obtaining the best safety and lowest cost outcome for the aviation industry

Taskforce roles

Provide advice to the government to assist in setting key directions and priorities for aviation safety regulatory reform for the next 5 years and

Explore options and identify solutions for implementing the remainder of the regulatory Parts within realistic timeframes.

The Deputy Prime Minister has asked that the Taskforce report back to him by December 2007.

End of Quote.

As there was a Federal election on November 24th 2007 is this Taskforce still a current sitting body?

Have there been any further meetings held by the Taskforce?

It seems a waste of time, effort and dollars, if this Taskforce is not currently in operation.

2 Reports have been published

- Report on Comparison of the cost of Flying Training between Australia, USA, New Zealand and United Kingdom. (14 pages)
- International comparison of the cost of Maintenance Engineer training. (32 Pages)

Under the heading Organisations consulted, it is stated that there were 7 Flying Training Organisation interviewed across Australia. It would be interesting to see the breakdown of those 7.

Page 6.

Are they Flying Schools who rely wholly upon the overseas students coming into Australia to be trained for overseas airlines?

Are they Aero clubs, privately owned and operated flying Schools?

Are they Regionally based Flying Schools, i.e. BAE in Tamworth?

Were there any that were sole, owned and operated where the positions of Chief Pilot, Chief Flying Instructor, refueller, etc., were held by the one person.

Perhaps the reader of this submission may think that the above comments have no part in this document, but it is all information gathered that could be of use **“Towards a National Aviation Policy Statement.”**

3.1 Safety regulation and regulatory reform

Page 17 the last point talks about Self Administration.

Self Administration of what? Procedures, Rules, Privileges. ?

In some areas of the Aviation Industry it may/might work. The concern is that there could be individual interpretation of the various Standards

We need to be flying in Air space where everyone is on the “same page”

4. Customer and Community protection

4.1 Aviation Emissions and climate change.

The Manufacturers are continually researching areas in which to minimise the Emissions and for economical use of fuel.



See attached article from The Australian newspaper. Friday June 13th 2008 PAGE 34.

4.2 Aircraft Noise

State and Local Governments have a hard enough time running their “business” providing roads, kerb and guttering, waste disposal, parks/public toilets, many other services required to provide a pleasant living environment. Aviation is a complex and unique industry!

People need to be reminded that much of the freight carried through the night is for the community in general...i.e. Bank documents.

If people choose to live near an airport, it is expected that there will be noise. Just the same as people choose to live along a highway, or near a Railroad line. Of course there will be noise.

Talk to the Airport Owners, and those Operators that are using the now approved Airports with and without curfews.

4.3 Consumer protection

Problems often are due to the fact that many passengers (pax) have booked their flights through the Internet. In doing this, the "small print" is overlooked.

Passengers need to take responsibility for their actions, not leaving enough time to arrive at the airport, not allowing enough time to check, not allowing for delays on roads etc., all build up to delays for whatever reason, which could be avoided with a bit more forward planning.

If the delays are on the part of the Airline, that is another completely different point.

How can anyone "ensure" that another party is appropriately informed about Restrictions? The Passengers need to read the information on their tickets Ask questions of their travel agent. Contact the various web sites that are available through the Federal government giving Safe travel information.

4.4 Disability Standards.

There is reference made to "The Disability Standards for accessible Public Transport 2002 (the Transport Standards)

This is a document of 72 pages.

Having not read the document one should probably not comment on it.

One would hope that commonsense and compassion would be a part of any dealings with disabled people in all walks of life.

Possibly more areas of handicapped marked parking close/closer to the Departure and Arrival areas of Airports, would be a plus.

If passengers notify the airline that they require "assistance" be it wheelchair, walker, diet etc. These services are available.

4.5 Compensation arrangements in the event of an accident.

People need to read the information on their tickets.

Reference is made to the Montreal Convention. The Australian Family Assistance Code launched in 2002.

Not having read the document, cannot really make a comment.

5. Aviation Security

It is sad to think that there are people whose whole life is set on destroying another.

Page 8.

Again, it is often people who have no idea of the "How, Why, procedures, restrictions and regulations" that do the most complaining. They would be the first to complain if some major situation should occur.

We need Border Security. We need domestic and international security. We need quarantine inspection carried out.

These inspections are for our own good. If it takes a bit longer time to clear customs etc., and "come home" then so be it.

These rules are in place for a reason.

(It is shame that many of the Fruit fly inspection stations between South Australia and Victoria and in parts of NSW do not have a 24/7 hours of operation. It is often the honesty system that is used)

It was interesting to read in an Article on the Internet earlier this week, that there are 10 airports in the United States of America, that have installed X-ray machines that look through the clothes and reveal the body. Do we have to go that far? Pat down is still available.



See attached article from the Internet – dated 11th June 2008 – "New airport scanners see through clothes."

One of the points asks, 'Whether current passenger security screening requirements based around jet aircraft should be extended to non-jet aircraft or similar capacity, speed and weight?'

Dash 8's and SAAB's Metro's (non jet aircraft) operating out of Brisbane airport, their passengers are security screened.

Another point "The current focus of the aviation security system is regular passenger transport services. Should it be extended to include aircraft providing, for example charter services?"

One needs to understand what is meant by Charter? Is it the operator who does Charter from Toowoomba for example in a Cessna Caravan or aircraft of similar size and passenger carrying capacity??

How much more does the security need to be evident to Passengers? It is quite evident that if you wish to see family and friends off and go "into " the airport secured areas, then they go through security which is visual.

No special arrangements should be put in place for frequent travellers, just join the line!

Legal requirements.

The general public has come to expect a high level of security, so why would it be reduced?

Air Cargo security

Not being able to download or find reference to "Wheeler Review's September 2005 have no idea what is in the Review

Identity and background checking

It is of great national importance, that whoever is working in an area considered /designated to be of Security concern, certainly needs to have a Security clearance.

In the area of baggage handling where perhaps the turnover of staff is more frequent, the 5 year rule of checking for any criminal history in ones background is not regular enough. (The employee probably would not be the one paying for the issue of the card, more likely the employer.)

Applicants from overseas should have been briefed by their employer or flying School, from whatever area of the working world as to the possible delays that may occur in the issue of any documentation.

There are various types of ASIC cards issued, for various areas of Security.

Should background checking be extended to include manager/directors of companies with employees who hold an Aviation Security Identity Card (ASIC)? That is a hard one to comment on. Possibly.

It is hoped that any employer in whatever industry would have carried out some sort of background checking.

Conclusion.

Thankyou for taking the time to read this submission.

It is hoped that there will be a number of submissions received from various areas of the Aviation Industry.

Who am I??

Many of the thoughts and comments come from the fact that I have spent the majority of my life living in a Rural area and experienced things that people living in the city may not be aware of.

My early growing years were spent on a family farm overlooking the Parafield Airport – South Australia. It was looking up at the aircraft in the circuit area that was a fascination not only to me, but encouraged by my father's interest in Aviation.

1964 commenced flying. Hold a Private Pilots Licence (PPL)

Member of the Australian Women Pilots' Association, (AWPA) Aircraft Owners and Pilots Assoc. of Australia (AOPA)

1972 – 1978 Owned and operated a mixed farming property Manoora. SA

1978 – 2000 Owned and operated a family grain growing property (5500 acres) Moree N.S.W

2000 - 2007 Lived in the township of Moree.

A member of the Moree Aero Club since 1978. Was a committee member for a number of years and in 2002 – 2005 took on the commitment of President and Secretary.

2002 - 2007 Committee member: Moree Airshow Advisory Committee
You will see that my address is now a suburb of Brisbane.

Life takes some twists and turns and a move to Brisbane took place in December 2007.

May 2008 was nominated and accepted the position as Vice President of the Queensland Branch – Australian Women Pilots' Association (AWPA)

I look forward to continuing my love and interest in the Aviation Industry.

Barbara D. Palmer

CAPALABA. QSLND 4157

Aviation Reference Number (ARN) 034452

Barbara D. Palmer
June 19/2008

High-pressure engine cleaning saves millions on fuel

J. Lynn Lunsford

THE WALL STREET JOURNAL

AS airlines search for new ways to combat rising fuel costs, a growing number are finding that a hot bath can save millions of dollars.

In recent months, 50 airlines have hired United Technologies' Pratt and Whitney unit to wash their engines with a new machine that can deep-clean while simultaneously collecting and purifying hazardous run-off.

With fuel now the largest component of operating costs, carriers are turning to fuel saving measures that once seemed hardly worthwhile. Since 2001, hundreds of jetliners worldwide have been outfitted with upswept wingtips that increase range and make them more aerodynamically efficient.

Pilots routinely taxi to and from the runway on one engine to save fuel and operate planes' auxiliary power units and other equipment as little as possible, but the industry is running out of easy fixes.

Pratt and Whitney's engine washing system, called EcoPower, has been under development since 2004, but only recently have the potential fuel savings become a big selling point.

"When fuel was a quarter of its current cost, engine washing didn't look as attractive as it does now," says Rick Wysong, a maintenance vice-president in charge of engineering for United Airlines, one of EcoPower's largest customers.

Since 2004, Pratt and Whitney has performed more than 2000 of these engine washes. It says demand for the service has grown to the point that it will probably wash 5000 engines this year.

"This is the right technology at exactly the right time in the industry," says Jim Keenan, senior vice-president and general manager of Pratt's Global Service Partners, which manages pro-

grams such as EcoPower.

Other engine manufacturers are working to develop similar technology, but so far, Pratt and Whitney has a jump on competitors with a proprietary system that is mounted on trucks so it can be used at the gate on any jet engine, regardless of the manufacturer. The trucks can filter the run-off — much of which is toxic — at the same time. Pratt then disposes of the hazardous materials.

Pratt says scouting caked-on grime from the inside of an engine reduces fuel consumption by about 12 per cent. That may not sound like much, but it adds up quickly. Pratt contends that if every airline in the world washed its engines, the industry could save about \$US1 billion (\$1.01 billion) a year in fuel costs and cut carbon dioxide emissions by 1.45 billion kilograms. Clean engines also run cooler, allowing airlines to avoid costly overhauls for as long as 18 additional months.

Washing takes about 90 minutes and uses power from the plane's auxiliary power unit and the wash truck. Washing pays for itself in a matter of weeks.

Even though they have yet to wash their entire fleets, officials for Southwest Airlines and United, two of EcoPower's biggest clients, say they are already realising savings.

"It's more than just a subtle improvement when they wash these engines," says Johnny Holley, manager of Southwest's engine maintenance and engineering. "A phenomenal amount of fuel can be saved doing this."

Southwest started its new washing program in April and as of late May had done 248 washes. The company estimates its fuel savings from those washes have totalled about \$US16 million. United says it is washing its entire fleet

at least twice a year, which amounts to about 3000 washes annually. It plans to wash its long-haul aircraft engines more often. United says its tests have shown that washing engines will help it save about 13.6 million litres of fuel annually.

EcoPower is showing signs of becoming a lucrative venture for Pratt. The list price for each wash is between \$US3000 and \$US5000, depending on the engine's size, although large customers typically get discounts.

In addition to United and Southwest, customers include Air India, Hawaiian Airlines, Martinair, Northwest Airlines, Singapore Airlines, Swiss International Air Lines and Virgin Atlantic.

Pratt says it is in talks with several other carriers, some of which are conducting field trials.

The industry has known for years that cleaner engines are more efficient, but the science never evolved much beyond spraying them down outside the maintenance hangar with fire hoses or "shepherd's crook" sprayers that spewed hazardous solvents.

During thousands of hours of operation, gunk in the air builds up an oily crust on the tiny fan blades, which compress intake air before it enters the combustion chamber. Over time, the engine becomes less efficient and starts to run at a hotter temperature, which increases wear and burns more fuel.

Rather than using harsh chemicals and high pressure, EcoPower uses a proprietary system of nozzles to spray atomised water directly into the core of the engine while it is being turned at low speeds.

The process is so clean that some airports that had banned engine washing, such as New York's John F. Kennedy International, now allow Pratt to wash engines at the gate during overnight stops.

During a recent lull job at Southwest's home base, Dallas Love Field, Pratt washed the engines on a 10-year-old Boeing 737, powered by CFM-56 engines made by General Electric and Engine's Snecma.

One technician placed a special yellow manifold with several nozzles to the opening of the right engine while two more rolled the cart that collects the run-off into place beneath the engine. When everything was ready, Pratt technician Mike Ashmore gave the signal for a mechanic in the plane's cockpit to begin spinning up the engine while he turned on the water nozzles.

As the engine roared in the background, Ashmore kept track of the elapsed time on a stopwatch while he monitored the gauges on the EcoPower control panel. After two minutes, he signalled the cockpit to shut down the engine, then walked over and scooped up a cup of the rust-colored sludge dripping from the exhaust pipe.

"You probably wouldn't want to drink this stuff," he said. (Pratt says the effluent is a mixture of soot, dirt and salt, as well as some hazardous substances such as lead and arsenic.)

Ashmore dipped an instrument into the cup, which showed that the water had 2622 parts per million of contaminants. After four more rinses, the number was 515, in the region that a clean engine typically reads.

"For an engine that has probably been on the plane for several years, this is typically the kind of dirt we get out," says Anupam Bhargava, general manager of the EcoPower program, as the machine completed its final wash. "If the engine is washed a couple of times a year, it won't get this dirty again."

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Wednesday June 11, 11:20 AM

New airport scanners see through clothes

By AFP

Security scanners which can see through passengers' clothing and reveal details of their body underneath are being installed in 10 US airports, the US Transportation Security Administration says.

A random selection of travellers getting ready to board airplanes in Washington, New York's Kennedy, Los Angeles and other key hubs will be shut in the glass booths while a three-dimensional image is made of their body beneath their clothes.

The booths close around the passenger and emit "millimetre waves" that go through cloth to identify metal, plastics, ceramics, chemical materials and explosives, according to the TSA.

While it allows the security screeners - looking at the images in a separate room - to clearly see the passenger's sexual organs as well as other details of their bodies, the passenger's face is blurred, TSA said in a statement on its website.

The scan only takes seconds and is to replace the physical pat-downs of people that is currently widespread in airports.

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TSA began introducing the body scanners in airports in April, first in the Phoenix, Arizona terminal.

The installation is picking up this month, with machines in place or planned for airports in Washington (Reagan National and Baltimore-Washington International), Dallas, Las Vegas, Albuquerque, Miami and Detroit.

But the new machines have provoked worries among passengers and rights activists.

"People have no idea how graphic the images are," Barry Steinhardt, director of the technology and liberty program at the American Civil Liberties Union, told AFP.

The ACLU said in a statement that passengers expecting privacy underneath their clothing "should not be required to display highly personal details of their bodies such as evidence of mastectomies, colostomy appliances, penile implants, catheter tubes and the size of their breasts or genitals as a pre-requisite to boarding a plane."

Besides masking their faces, the TSA says on its website, the images made "will not be printed stored or transmitted".

"Once the transportation security officer has viewed the image and resolved anomalies, the image is erased from the screen permanently. The officer is unable to print, export, store or transmit the image."

Lara Uselding, a TSA spokeswoman, added that passengers are not obliged to accept the new machines.

"The passengers can choose between the body imaging and the pat-down," she told AFP.

TSA foresees 30 of the machines installed across the country by the end of 2008. In Europe, Amsterdam's Schipol airport is already using the scanners.

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