
2019

**TRIENNIAL SECURITY REVIEW OF
SAN FRANCISCO INTERNATIONAL AIRPORT
AIRTRAIN**

RAIL TRANSIT SAFETY BRANCH
RAIL SAFETY DIVISION
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

[REDACTED VERSION]

Final Report
January 20, 2021

Daren Gilbert, Program Manager
Rail Transit Safety Branch
Rail Safety Division



2019 TRIENNIAL SECURITY REVIEW
SAN FRANCISCO INTERNATIONAL AIRPORT - AIRTRAIN

ACKNOWLEDGEMENT

The California Public Utilities Commission's Rail Transit Safety Branch (RTSB) conducted this system security program review. Staff members directly responsible for conducting security review and inspection activities include:

Rupa Shitole – Utilities Engineer

Joey Bigornia – Utilities Engineer

Mike Warren – Utilities Engineer

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1. EXECUTIVE SUMMARY

The California Public Utilities Commission's Safety and Enforcement Division (Effective July 1, 2019, now the Rail Safety Division - RSD), Rail Transit Safety Branch (RTSB) staff (Staff), conducted an on-site system security program review of San Francisco International Airport AirTrain (AirTrain) on June 17, 2019. The review focused on verifying the effective implementation of the System Security Plan, addressing Threat & Vulnerability Assessment (TVA) and emergency response.

On Monday, June 10, 2019, AirTrain personnel and Staff met for an opening conference, which preceded the on-site review activities. On June 17, 2019, Staff conducted the 2019 AirTrain triennial on-site security review. A post-review conference meeting occurred on January 24, 2020, with Staff providing AirTrain personnel with a summary of its review. [REDACTED]

Section 2 (Introduction) of this report provides a summary of the authority under which the California Public Utilities Commission (CPUC or Commission) performs the triennial reviews and presents a brief chronology of the review. Section 3 (Background) includes a description of the SDTI system. Section 4 (Security Review Procedure) explains the procedures used by Staff during the System Security Review. Staff's findings of non-compliance and recommendations are presented in Section 5 (Findings and Recommendations), organized by source checklist numbers. Finally, the Appendices include a list of abbreviations and acronyms used in the report and checklists, tabulated findings and recommendations, and the complete set of the five security review checklists with summaries of all review activities and the original comments, findings, and recommendations.

This report reflects Staff's triennial security review of AirTrain. The AirTrain on-site triennial safety review report is contained in a separate Report and is brought before the Commission for approval in a separate Resolution.¹

¹ Staff's safety review and report, "2019 Triennial Safety Review of San Francisco International Airport AirTrain" is being brought before the Commission concurrently in Resolution ST-233.

2. INTRODUCTION

The Commission's General Order (GO) 164-E *Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems*, Section 4, *Requirements for System Security Plans* and the Federal Transit Administration's (FTA) Rule, Title 49 Code of Federal Regulations (CFR) Part 659, *Rail Fixed Guideway Systems: State Safety Oversight*, require the designated State Safety Oversight Agencies to perform a review of each rail transit agency's system security program at a minimum of once every three years. The triennial security review verifies compliance and evaluates the effectiveness of each rail transit agency's System Security Plan (SSP)—in this case the AirTrain System Security Plan—to assess the level of compliance with GO 164-E and other Commission safety and security requirements. Staff conducted the previous AirTrain on-site security review in August 2016.

On May 16, 2019, Staff advised the AirTrain Manager that the Commission's safety and security reviews had been scheduled for June 10-June 17, 2019. The letter included five checklists that served as the basis for the security review. The checklists, included in Appendix C, focus primarily on verifying the effective implementation of AirTrain's SSP.

On June 10, 2019, Staff conducted an opening conference with the AirTrain Manager, AirTrain Assistant Manager, AirTrain Chief Operating Officer and AirTrain Operating and Maintenance personnel. On June 17, 2019, Staff conducted the triennial on-site security inspection and records review. Staff developed five (5) checklists for the inspection of the System Security Plan that Staff derived from the CPUC's GO 164, FTA's 49 CFR 659, Transportation Security Administration's (TSA) Baseline Security Review, and AirTrain' SSP. At the conclusion of each review activity, Staff provided a verbal summary of the preliminary findings to AirTrain personnel and discussed initial recommendations for corrective actions, if any.

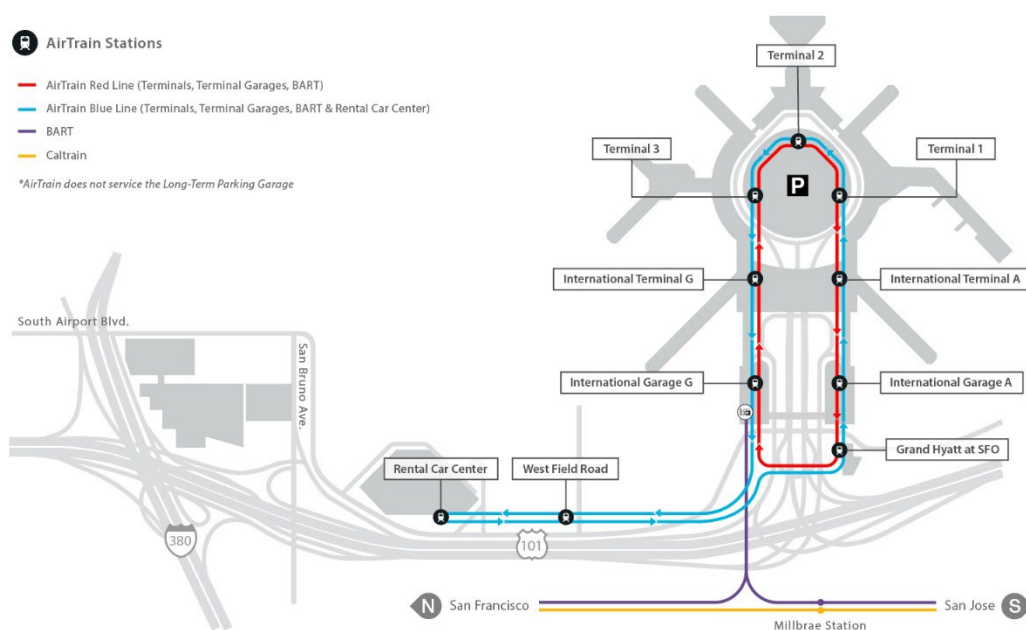
On January 24, 2020, Staff conducted a post-review exit meeting with AirTrain Manager, AirTrain Assistant Manager and AirTrain Operating and Maintenance personnel. Staff provided attendees a summary of the review and findings from the five checklists. Staff concluded AirTrain generally demonstrates compliance with its SSP [REDACTED] based on the five triennial security checklists.

3. BACKGROUND

AirTrain at the San Francisco International Airport began operation on February 24, 2003 as a six-mile system. It operates 24 hours every day, providing free service throughout the San Francisco International Airport (SFIA). The SFIA AirTrain was originally contracted to Bombardier as a design-build-operate-maintain project. The system is owned by the San Francisco Airports Commission and currently operated and maintained by Bombardier. With a fleet of 38 (thirty-eight) CX-100 people movers, the six-mile system serves nine stations connecting all the airport terminals, parking garages, and the Bay Area Rapid Transit (BART) Airport Station with the Rental Car Center.

The AirTrain system operates two lines. These are:

- Blue Line – all terminals, garages, BART Station, and Rental Car Center
- Red Line – all terminals, garages, and the BART Station.



Scope of Security Review

Commission Staff conducted its security review in accordance both with guidance and training from the Federal Transit Administration (FTA) and with Title 49 Code of Federal Regulations, Part 659. Section 659.23 of the Code of Federal Regulations defines the requirements for a System Security Plan (SSP) for rail transit agencies.

According to 49 CFR § 659.23, the system security plan must, at a minimum address the following:

- (a) Identify the policies, goals, and objectives for the security program endorsed by the agency's chief executive.
- (b) Document the rail transit agency's process for managing threats and vulnerabilities during operations, and for major projects, extensions, new vehicles and equipment, including integration with the safety certification process;
- (c) Identify controls in place that address the personal security of passengers and employees;
- (d) Document the rail transit agency's process for conducting internal security reviews to evaluate compliance and measure the effectiveness of the system security plan; and
- (e) Document the rail transit agency's process for making its system security plan and accompanying procedures available to the oversight agency for review and approval.

The requirements of section 659.23 serve as the basis for the five security checklists guiding Staff's review of the AirTrain security program. Staff evaluated AirTrain security plans and procedures to determine whether they meet the requirements of section 659.23. The triennial security review evaluates whether AirTrain has defined necessary security activities, established responsibilities and accountability, set priorities, provided employee training, developed information distribution and controls, and developed monitoring and feedback loops to determine effectiveness of the security plans and procedures.

For the purpose of the security reviews, "security" means the general areas identified in the FTA requirements of section 659.23. Staff inquiries during the review examine whether the processes and procedures AirTrain adopted are implemented in accordance with statute and their SSP. Staff does not evaluate AirTrain's response to specific crimes or events, except during evaluations to assure processes and procedures in place are implemented as intended. Specific crimes and criminal behavior that may occur on trains and stations is considered outside of scope of the review and are handled by the local Police Department within that jurisdiction.

Each Staff member involved in the security review received training from the FTA. All Staff have taken and successfully passed the Transit System Security training

course, which provided in-depth instruction on security plan requirements, typical methods of compliance, and industry best practices.

Moreover, all Staff in the Rail Transit Safety Branch take the FTA's Rail System Security course as part of their overall training. This allows Staff members out in the field to identify security concerns at all times when conducting general oversight activities or inspecting transit agency facilities and operations, not just during the triennial security review period. Staff evaluates and identifies security issues in the field, which are immediately discussed with the appropriate transit agency personnel to initiate the process for addressing the concern.

System Expansions and Capital Project

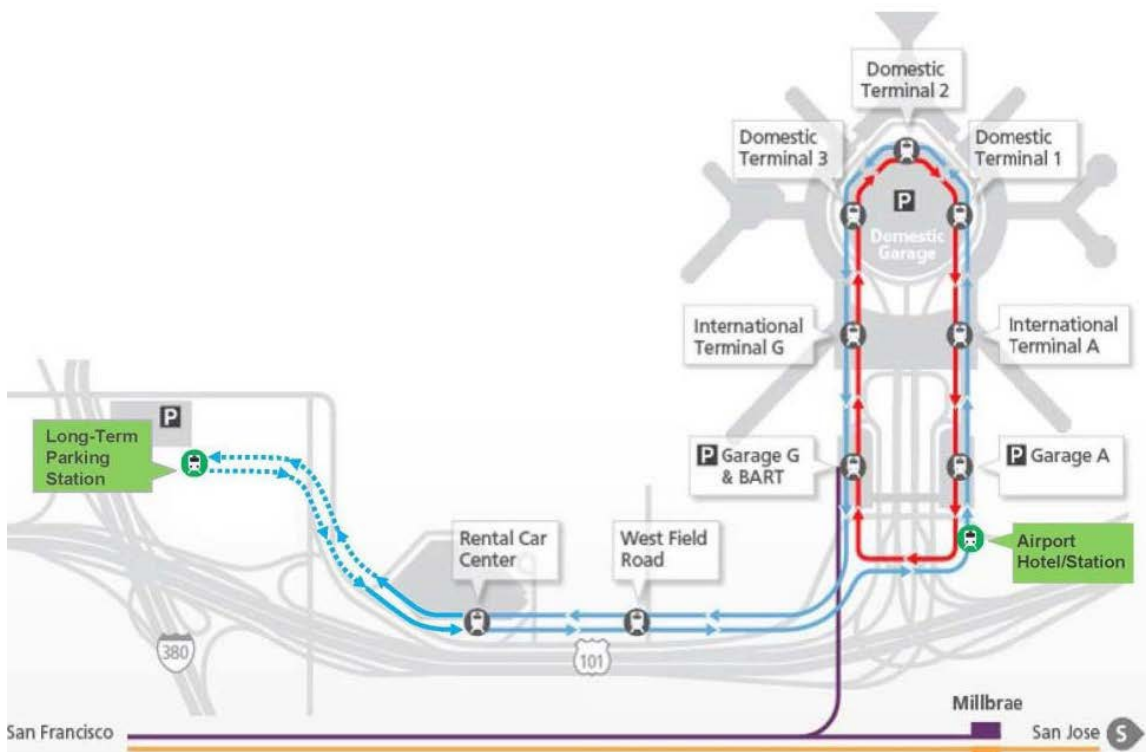
SFO AirTrain Extension and Improvement Program

The San Francisco International Airport (SFO) AirTrain Extension and Improvements Program (Project) will expand the existing AirTrain System to a new Long-Term Parking (LTP) Garage 2 and add an additional in-line Hotel Station serving a future hotel. The project is currently being constructed and is nearing completion.

The Project features will include the following:

- Upgrade to LOS train to wayside signaling and communications, including new single mode fiber optic backbone network, beginning with retrofit of the existing system
- Field retrofit of 38 existing vehicles and one (1) Maintenance Recovery Vehicle to LOS technology. The retrofit involves removing the ATC antennas which are presently located under car and replacing them with roof mounted antennas which interact with new LOS antennas located throughout the system. The vehicle roof antennas will interface with the ATC by means of a new Mobile Data Radio.
- Central Control upgrade, including EBI Screen 1500 technology.
- 2,000 ft. guideway extension to a new LTP #2 Garage, including civil design services for the guideway fixed facilities and design and supply of the guidebeam.
- Two stations: LTP Station at Lot DD and Hotel Station.
- Four (4) additional guideway crossover switches.

- Additional traction power system for the 2,000 ft. extension, including a PDS substation, switchgear, power and grounding rails, and additional UPS equipment.
- Barrier wall, platform screen door, and station audio communications systems for the LTP Station and Hotel Station.
- Three (3) Innovia APM CX-100 vehicles.



Status of the 2016 AirTrain Triennial Security Review

Staff performed the previous triennial on-site security review in 2016. No Findings or Recommendations were identified during that review. CPUC Resolution ST-199, adopted on February 9, 2017, granted Commission approval of Staff’s final 2016 AirTrain On-Site Triennial Security Review report.

4. SECURITY REVIEW PROCEDURE

Staff conducted the 2019 security review in accordance with Rail Transit Safety Section Procedure RTSB-4, *Procedure for Performing On-Site Triennial Safety and Security Reviews of Rail Transit Systems*, and G.O. 164-E, Section 4, Requirements for System Security Plans. Staff developed five (5) checklists to cover various aspects of system security responsibilities, based on Commission and FTA requirements, (49 C.F.R § 674.27, et seq., AirTrain SSP, security-related AirTrain documents, Department of Homeland Security, Transportation Security Administration (TSA) baseline review list, TSA “sensitive security information (49 C.F.R. § 1520 et seq.), and the knowledge of Staff of AirTrain operations. A list of the 5 checklists is provided in Appendix B. The completed checklists are shown in Appendix C.

Each checklist identifies security-related elements and characteristics that were either inspected or reviewed by Staff. Each checklist references Commission, AirTrain, and other documents that establish the security program requirements. The methods used to perform the review included:

- Discussions and interviews with AirTrain Administrative Office personnel.
- Review of rules, procedures, policies, and records.

Immediately following the security review, Staff summarized the findings and the preliminary recommendations (if appropriate) with involved AirTrain personnel. The post-review summary is beneficial to clarify findings or best-practices and provides AirTrain an opportunity to promptly address any necessary security improvements.

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APPENDIX A

ABBREVIATION and ACRONYM LIST

Abbreviation / Acronym	Description
AOA	Airport Operations Area
ASP	Airport Security Plan
AVSEC	Aviation Security
BART	Bay Area Rapid Transit District
CAP	Corrective Action Plan
CFR	Code of Federal Regulations
Commission	California Public Utilities Commission
CPUC	California Public Utilities Commission
FBI	Federal Bureau of Investigation
FTA	Federal Transit Administration
FEMA	Federal Emergency Management Agency
GO	General Order
ISA	Internal Security Audit
RTSB	Rail Transit Safety Branch
SAO	Security Access Office
SCHNM	Safety Concern/Hazard/Near Miss
SED	Safety and Enforcement Division
SFPD	San Francisco Police Department
SFIA	San Francisco International Airport
SSP	System Security Plan
SSPP	System Safety Program Plan
Staff	Safety and Enforcement Division personnel
TSA	Transportation Security Administration
TVA	Threat and Vulnerability Assessment

APPENDIX B
2019 AIRTRAIN TRIENNIAL SECURITY REVIEW CHECKLIST
INDEX

Checklist No.	Department	Element/Characteristics
1	AirTrain Administrative Office	Identify Policies, Goals, and Objectives
2	AirTrain Administrative Office	Process for Management of Threats and Vulnerabilities (TVA)
3	AirTrain Administrative Office	ID Concepts for Passenger and Employee Security
4	AirTrain Administrative Office	Internal Security Audit Program
5	AirTrain Administrative Office	Process for Generating and Administration of System Security Plan

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APPENDIX C

2019 AIRTRAIN TRIENNIAL SECURITY REVIEW CHECKLISTS

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**2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR
SAN FRANCISCO INTERNATIONAL AIRPORT AIRTRAIN
AUTOMATED PEOPLE MOVER (AIRTRAIN)**

Checklist No.	1	Element	Identify Policies, Goals, and Objectives
Date of Audit	June 17, 2019	Department(s)	AirTrain Administration Office (AAO)
Auditors/ Inspectors	Joey Bigornia Rupa Shitole Michael Warren	Persons Contacted	Lee Mitchell, Manager (AAO) Michael Robert, Assistant Manager (AAO)

REFERENCE CRITERIA

1. AirTrain System Security Plan, effective September 2015, rev. 1
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23
5. Airport Security Program (ASP)
6. Contract 8838

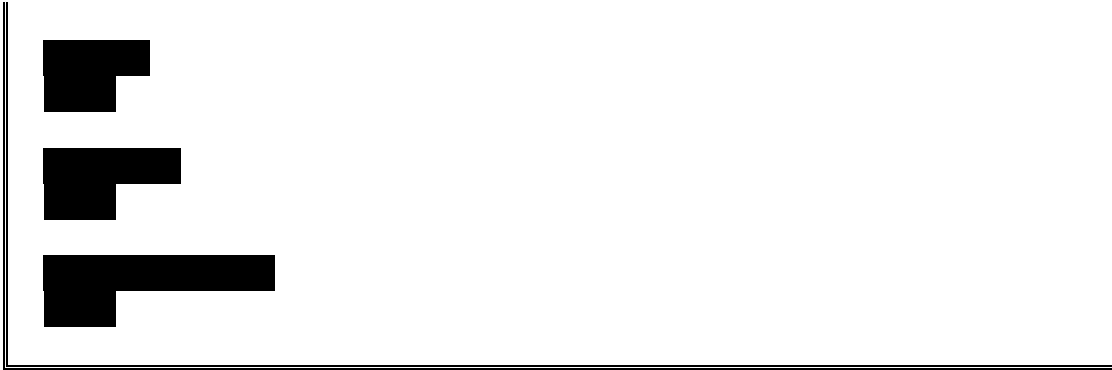
ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Identify Policies, Goals, and Objectives -

Interview the AirTrain Security Team responsible for policies, goals, and objectives to verify for the past three years:

1. The AirTrain SSP is certified by AirTrain Chief Operating Officer, AirTrain Manager, and Bombardier Site Director;
2. AirTrain ensures all employees participates in security awareness and trains employees on security requirements and emergency preparedness;
3. AirTrain eliminates, minimizes, or controls identified security issues through design modification and/or procedural changes;

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**2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR
SAN FRANCISCO INTERNATIONAL AIRPORT AIRTRAIN
AUTOMATED PEOPLE MOVER (AIRTRAIN)**

Checklist No.	2	Element	Threat and Vulnerability Assessments (TVA)
Date of Audit	June 17, 2019	Department(s)	AirTrain Administration Office (AAO)
Auditors/Inspectors	Joey Bigornia Rupa Shitole Michael Warren	Persons Contacted	Lee Mitchell, Manager (AAO) Michael Robert, Assistant Manager (AAO)

REFERENCE CRITERIA

1. AirTrain System Security Plan (SSP), effective September 2015, rev. 1
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23
5. Airport Security Program (ASP)

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Threat and Vulnerability Assessments (TVA)-

Interview the AirTrain representatives responsible for the Security Enforcement, review the SSP, ASP, and TVAs for the past three years to determine if:

1. AirTrain’s Chief Operating Officer has complete knowledge of the system and is familiar with any crimes that may impact the system;
2. AirTrain performed a Threat and Vulnerability Assessments (TVA) that identified facilities and systems containing critical assets by the following measures:
 - a. Identify potential threats facing the System
 - b. Identify vulnerabilities within and the APM O&M services that maybe exploited to carry out these threats
 - c. Analyze the potential impacts of each threat and vulnerability scenario

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- d. Develop and implement corrective actions and countermeasures to eliminate, minimize, or otherwise prepare for attacks and security incidents
 - e. Protect against identified potential threats and vulnerabilities.
 - f. Tracking all corrective actions taken to address potential threats and vulnerabilities.
3. AirTrain has a process for auditing, revising or updating the TVAs:
- a. Terrorism and/or Criminal Activity
 - b. Natural Disasters
 - c. Emergency Response Capabilities
 - d. System Vulnerabilities
4. AirTrain has implemented or is considering for implementation TVA recommendations for the past year;
5. AirTrain's Chief Operating Officer, AirTrain Manager, and Site Director has approved the TVAs;
6. AirTrain has implemented a background screening process for all new hires and contractors.

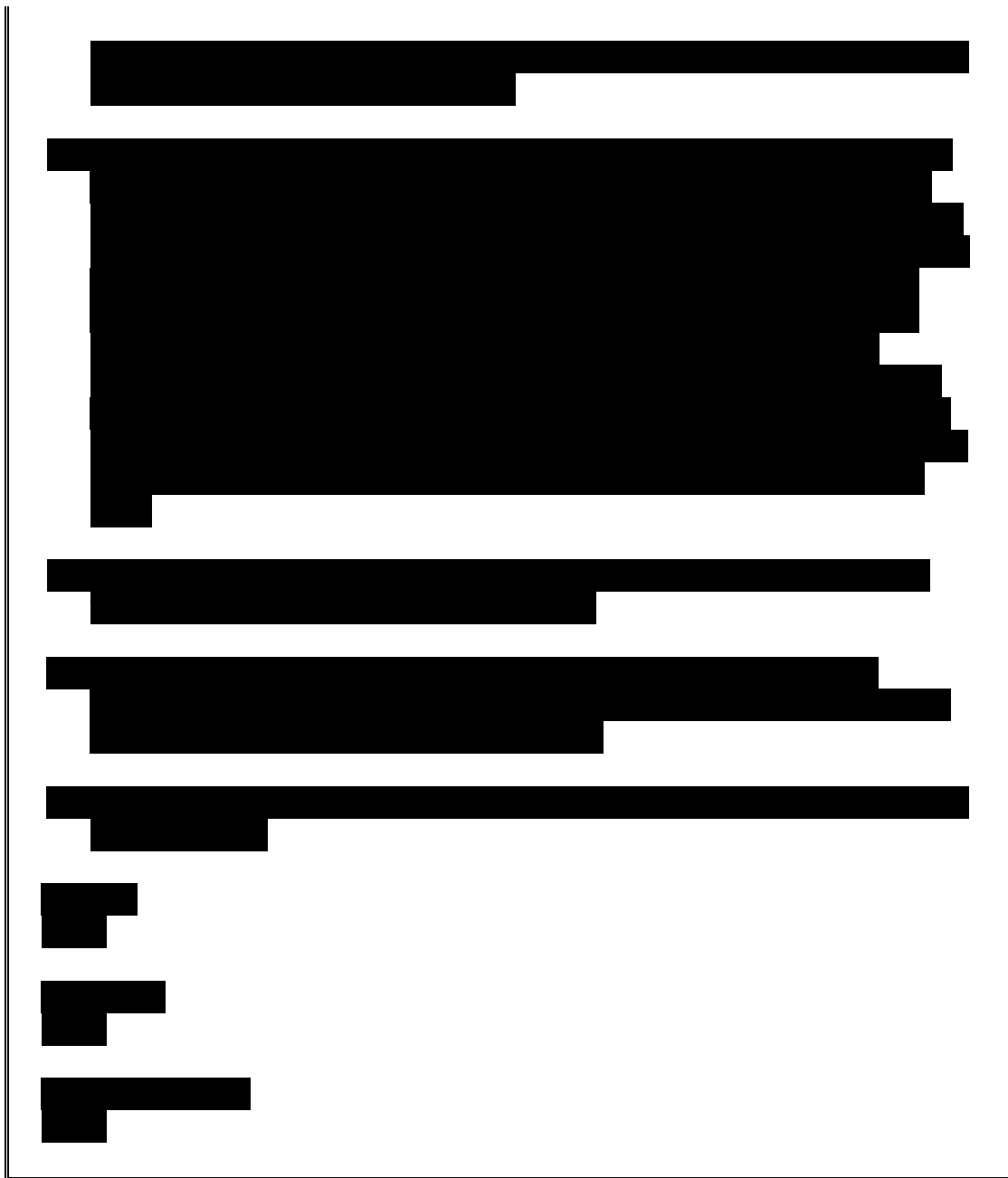
FINDINGS AND RECOMMENDATIONS

[REDACTED]

[REDACTED]

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**2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR
SAN FRANCISCO INTERNATIONAL AIRPORT AIRTRAIN
AUTOMATED PEOPLE MOVER (AIRTRAIN)**

Checklist No.	3	Element	ID Concepts for Passenger and Employee Security
Date of Audit	June 17, 2019	Department(s)	AirTrain Administration Office (AAO)
Auditors/Inspectors	Joey Bigornia Rupa Shitole Michael Warren	Persons Contacted	Lee Mitchell, Manager (AAO) Michael Robert, Assistant Manager (AAO)

REFERENCE CRITERIA

1. AirTrain System Security Plan, effective September 2015, rev. 1
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23
5. Airport Security Program (ASP)
6. Contract 8838

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

ID Concepts for Passenger and Employee Security -

Interview the AirTrain representatives responsible for the Security & Communication with Homeland Security involvement, review the security incident reporting program for the past three years to determine if:

1. AirTrain's Lock and Key Program has a process to track and deactivates employee ID cards and collect keys to AirTrain facilities and secured areas upon separation from AirTrain or if an employee/contractor loses his/her ID card and/or keys;
2. AirTrain Operators inspect and maintain all security systems such as Station CCTV System, intrusion alarms, and emergency telephones;
3. AirTrain's employees and contractors have all passed the SFIA Security test per ASP Section 11 and Appendix L, bi-annually;
4. All Contractors and Subcontractors must meet the requirements listed

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[REDACTED]

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[REDACTED]

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2. [REDACTED]

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**2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR
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AUTOMATED PEOPLE MOVER (AIRTRAIN)**

Checklist No.	4	Element	Internal Security Audit Program
Date of Audit	June 17, 2019	Department(s)	AirTrain Administration Office (AAO)
Auditors/Inspectors	Joey Bigornia Rupa Shitole Michael Warren	Persons Contacted	Lee Mitchell, Manager (AAO) Michael Robert, Assistant Manager (AAO)

REFERENCE CRITERIA

1. AirTrain System Security Plan, effective September 2015, rev. 1
2. CPUC General Order 164-D, Section 4 & 5
3. CPUC General Order 164-E, Section 4 & 5
4. 49 CFR Part 659, Section 659.23

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Internal Security Audit Program -

Interview the AirTrain representatives responsible for the Internal Security Audit Process, review the procedure and the audit reports for the past three years to determine if:

1. AirTrain Safety and Security Manager performed the annual internal security audit;
2. AirTrain addressed all of the required security program elements within the past audit cycle, typically 3 years;
3. AirTrain Manager made the internal security audit schedule available to CPUC Staff 30-days before scheduling;
4. AirTrain Internal Security Audit (ISA) annual report includes the findings and corrective actions;
5. AirTrain Safety and Security Manager submits the final report to

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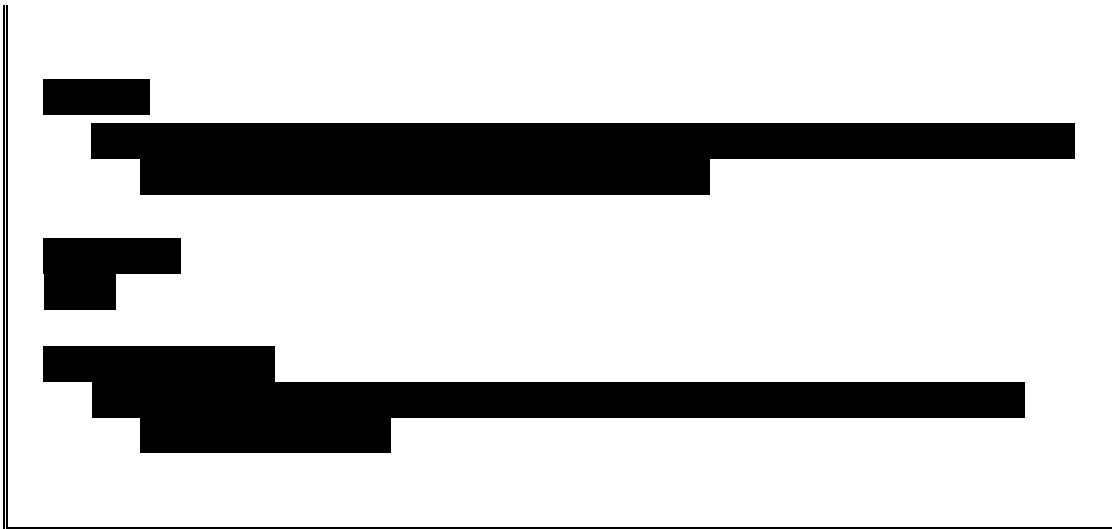
AirTrain Manager for review and approval.

6. AirTrain Safety and Security Manager forwards the final report to the Operations and Maintenance (O&M) Site Director, O&M Safety Engineer, Airport Deputy Director of Operations, Airport Chief Operations and to the Air Train Manager, Airport Deputy Director of Operations, Airport Chief Operations Officer Senior. A copy of the ISA report is submitted to CPUC Staff to show compliance with its SSP;
7. AirTrain prepares, implements, and tracks the corrective action plans (CAP) and schedules to completion.

FINDINGS AND RECOMMENDATIONS

[REDACTED]

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2019 CPUC SYSTEM SECURITY REVIEW CHECKLIST FOR SAN FRANCISCO INTERNATIONAL AIRPORT AIRTRAIN AUTOMATED PEOPLE MOVER (AIRTRAIN)

Checklist No.	5	Element	Process for Generating and Administration of System Security Plan
Date of Audit	June 17, 2019	Department(s)	AirTrain Administration Office (AAO)
Auditors/ Inspectors	Joey Bigornia Rupa Shitole Michael Warren	Persons Contacted	Lee Mitchell, Manager (AAO) Michael Robert, Assistant Manager (AAO)

REFERENCE CRITERIA

1. AirTrain System Security Plan, effective September 2015, rev. 1
2. CPUC General Order 164-D, Section 4.0
3. CPUC General Order 164-E, Section 4.0
4. 49 CFR Part 659, Section 659.23
5. Airport Security Program (ASP)

ELEMENT/CHARACTERISTICS AND METHOD OF VERIFICATION

Process for Generating and Administration of System Security Plan -

Interview the AirTrain representatives responsible for the System Security Plan (SSP) Administration, review the SSP implementation, and update process of the SSP for the past three years to determine if:

1. AirTrain Administration Office annually reviewed SSP and updates AirTrain SSP as needed;
2. AirTrain Manager sent a letter to the Commission Staff detailing plan modifications, if any;
3. AirTrain has an existing process for revising the SSP (found in day-to-day operation, internal concerns, external concerns and drill concerns);
4. AirTrain has an existing process to track all Corrective Action Plan(s) incorporated, or to be incorporated, in the SSP from beginning to end;

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