

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
IN RE SEPTEMBER 11 LITIGATION	:	
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-----X	:	21 MC 97 (AKH)
	:	21 MC 101 (AKH)
	:	This document relates to:
IN RE SEPTEMBER 11 PROPERTY DAMAGE	:	All Cases
AND BUSINESS LOSS LITIGATION	:	
	:	
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**PLAINTIFFS' JOINT MASTER DISCOVERY (SECOND SET)**  
**AIRLINE AND SECURITY COMPANY DEFENDANTS**

PLEASE TAKE NOTICE that pursuant to Rule 34 of the Federal Rules of Civil Procedure, the PI/WD Plaintiffs' Executive Committee and the PD/BL Plaintiffs' Executive Committee, by and through their respective Liaison Counsel, and on behalf of all plaintiffs in 21 MC 97 and 21 MC 101 (the "September 11 Actions"), request that all Airline and Security Company Defendants produce the documents and things specified below to all Liaison Counsel at their respective addresses of record in accordance with the procedures set forth in paragraph 4(a) of the September 28, 2005 Supplemental Case Management Order entered in the September 11 Actions.

These Requests are governed by Local Civil Rule 26.3. All defined terms and rules of construction set forth in Local Civil Rule 26.3 are incorporated into these Requests by reference, and are supplemented as permitted by Local Civil Rule 26.3(a) by the definitions and instructions set forth herein.

## DEFINITIONS

1. "9/11" means all matters concerning the hijacking and crash of the Hijacked Airplanes in any way, including all matters concerning the 9/11 Terrorists and any event arising out of or relating in any way to the hijacking and crash of the Hijacked Airplanes.
2. "9/11 Commission" means the National Commission on Terrorist Attacks Upon The United States and any member, staff, personnel or agent of such commission.
3. "9/11 Terrorists" means, individually and collectively, the hijackers of each of the Hijacked Airplanes.
4. "ATA" means the Air Transport Association of America, Inc. and its affiliated entities, and any person employed by or acting on behalf of any of the foregoing.
5. "Aviation Security" means all matters concerning aircraft, airline, airport and aviation security, including passenger and carry-on baggage screening and pre-screening, screening checkpoints, security policies and procedures, threats to civil aviation, hazardous, dangerous, deadly or Threatening Items, in-flight security, cockpit security, the collection, review, analysis, or dissemination of security-related data, intelligence or threat information, security-related training, hijacking, sabotage and terrorism.
6. "CAPPS" is an acronym for the computer-assisted passenger prescreening system implemented by domestic airlines in December 1998.
7. "Congressional Joint Inquiry" means the Congressional Joint Inquiry on intelligence regarding 9/11.

8. “Gore Commission” means the White House Commission on Aviation Safety and Security established on or around July 25, 1996.

9. “Hijacked Airplanes” means, individually and collectively, the airplanes hijacked on September 11, 2001.

10. “Insurance Policies” means any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the September 11 Actions or to indemnify or reimburse for payments made to satisfy the judgment.

11. “Insurance Carrier” means any insurer, co-insurer, reinsurer or other person carrying on an insurance business who may be liable to satisfy part or all of a judgment which may be entered in the September 11 Actions or to indemnify or reimburse for payments made to satisfy the judgment.

12. “Related Persons” means, individually and collectively, you and your corporate parent, subsidiaries and affiliates, any person who is a director, officer, employee or agent of any of the foregoing, and any person related by blood, marriage or familial relationship to such person.

13. “Security Checkpoint” means the security checkpoint at any Subject Airport through which any 9/11 Terrorist passed on September 11, 2001.

14. “Subject Airports” means, individually and collectively, Boston Logan International Airport, Newark Liberty International Airport, Washington Dulles International Airport and the Portland International Jetport.

15. “Tangible Thing” has the meaning ascribed to that term in Rule 34 of the Federal Rules of Civil Procedure.

16. "Threatening Items" means mace, pepper spray or similar personal protection sprays, tear gas, knives with serrated edges, knives of any blade length, fake bombs, razor blades, razor knives, box cutters, and any item prohibited in the passenger cabin of your aircraft on September 11, 2001.

### **INSTRUCTIONS**

The following Instructions apply to each request set forth herein.

1. To the extent any document requested herein was produced in response to Plaintiffs' Master Discovery (First Set), such document need not be reproduced in response to this Request.

2. To the extent you redact any portion of any document, such redaction must be clearly marked "redacted" with the name of the party making the redaction (*e.g.*, "UAL Redaction" or "AA Redaction") and identified on a log of all redactions indicating the Bates number where the redaction appears and the purported justification for the redaction. Nothing in this instruction shall be interpreted as an agreement as to the appropriateness of any redaction made by you to any document.

3. A request for a document shall be deemed to include a request for any and all file folders within which the document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

4. Documents shall be produced in such fashion as to identify the department, branch or office in which each document was located and, where applicable, the natural person in whose possession it was found and the business address of its custodian(s).

5. Documents attached to each other (physically or via electronic mail) should not be separated.

6. Produce all non-identical copies of any document responsive to any Request (including all notes, markings, flags or highlighting on any such non-identical copy).

7. If any documents requested herein were at one time in existence, but have been lost, discarded or destroyed, identify such documents and describe the circumstances under which the documents were lost, discarded or destroyed, including but not limited to, stating who lost or destroyed the documents, when, why, and pursuant to what authority, as well as the author, recipient, and subject matter of the documents.

8. If any document is withheld on the basis of a claim of privilege, state with respect thereto: (a) the privilege upon which you are relying; (b) the holder of the privilege; (c) the type of document (e.g., letter, memorandum, etc.); (d) the date of the document; (e) the author; (f) the addressee; (g) all persons who have received the document or with whom the document or its contents have been discussed in whole or in part; and (h) the subject matter of the document.

9. The Requests which follow are to be regarded as continuing in accordance with Rule 26(e) of the Federal Rules of Civil Procedure and you are requested to provide by the way of supplementary compliance herewith, such additional documents as you or any other person on your behalf may hereafter obtain, which will augment the documents produced in your initial response to the Requests below.

10. Unless otherwise specified, to the extent any document exists in electronic form, you are requested to produce the document in its native form.

11. To the extent any person or organization is identified by name in any Request, such Request shall be read to incorporate all alternate spellings of such person's or organization's name.

12. To the extent any document is referenced or requested by citation, quotation, name, date or title in any Request, such Request shall be read to incorporate all alternate citations, quotations, names, dates or titles that will facilitate the production of such document in the exercise of reasonable diligence.

### **REQUESTS FOR PRODUCTION**

1. All documents concerning communications by you or your counsel with any third party, including with any governmental agency, concerning any party, any claim or defense of any party, or any potential witness, in any September 11 Action.

2. All documents referenced in Exhibit A and all documents concerning the documents referenced in Exhibit A.

3. A copy of your internal website or intranet concerning Aviation Security as it existed on September 11, 2001.

4. All documents concerning Ahmad Farid Khorrami.

5. All documents concerning Julie E. Ashley, including all personnel files.

6. All documents concerning any confirmed or unconfirmed contact, communication, association, friendship or other relationship between any Related Person and any 9/11 Terrorist, including all documents concerning "a meeting with management that reported that an AA female FA is (or was) a girlfriend of a deceased hijacker" (AAL 004796).

7. Documents concerning any calls made to or by any 9/11 Terrorist from any telephone located at or in any of the Subject Airports.

8. Documents sufficient to identify your organizational structure for all Aviation Security-related functions on September 11, 2001.

9. All documents relating to Aviation Security from the files of your head of Aviation Security, and the senior-most individual with operational responsibility for Aviation Security at each Subject Airport, as those files existed on September 11, 2001.

10. All documents concerning 9/11 from the files of all Related Persons involved in the 9/11 Response.

11. All documents in your possession, custody or control concerning the interview of any person, no matter by whom conducted, concerning 9/11.

12. All documents in your possession, custody or control on or at any time prior to September 11, 2001, or concerning documents in your possession, custody or control or which you were aware of on or at any time prior to September 11, 2001, concerning the following:

- (a) Usama Bin Laden
- (b) al Qaeda or any known or suspected al Qaeda member
- (c) Jihad
- (d) any 9/11 Terrorist
- (e) Zacarias Moussaoui
- (f) Ramzi Yousef
- (g) Abdul Murad
- (h) Khalid Shaykh Mohammad

- (i) Ahmed Ressam
- (j) the Millenium plot
- (k) the U.S.S. Cole bombing
- (l) the bombing of the American Embassies in East Africa
- (m) the World Trade Center bombing
- (n) suicide hijacking
- (o) terrorism or terrorist threats
- (p) threats to civil aviation
- (q) flight training by terrorists or hijacking by trained pilots
- (r) the Air India hijacking in December 1999 and the Alas Chiricanas Airlines hijacking in July 1994
- (s) the Bojinka or Manilla plan or plot
- (t) any General Accounting Office audits, investigations, reports, testimony or publications concerning Aviation Security
- (u) any Department of Transportation Inspector General audits, investigations, reports, testimony or publications concerning Aviation Security
- (v) any RAND report or presentation concerning Aviation Security
- (w) Aviation Security-related problems or deficiencies at any of the Subject Airports
- (x) actual, possible, potential, threatened or hypothetical use of aircraft as a weapon, missile or "flying bomb" by terrorists, hijackers or persons gaining access to an aircraft cockpit

- (y) actual, possible, potential, threatened or hypothetical damage or injury to persons or property on the ground as a result of terrorists, hijackers or persons gaining unauthorized access to aircraft cockpit
- (z) actual, possible, potential, threatened or hypothetical crash or collision of aircraft with persons or property on the ground, including the Eiffel Tower, CIA Headquarters, the Pentagon, the World Trade Center, the White House, the U.S. Capitol building, any nuclear power facility, Madison Square Garden, FedEx headquarters, or any other landmark or structure
- (aa) any comparison concerning Aviation Security between domestic flights and international flights of domestic origin
- (bb) any comparison between Boeing aircraft and other aircraft concerning cockpit security or cockpit doors
- (cc) reinforcement or hardening of cockpit doors
- (dd) the vulnerability of unreinforced or unhardened cockpit doors to intrusion
- (ee) any comparison between your policies, procedures or practices concerning Aviation Security and those of any other airline or security company
- (ff) any comparison between the security companies hired by you and any other security company concerning Aviation Security
- (gg) the degree of acceptable risk concerning Aviation Security

- (hh) the HEROES program
- (ii) your duties, responsibilities or obligations to persons or property concerning Aviation Security
- (jj) your duty to “conduct screening ... to prevent or deter the carriage aboard airplanes of any explosive, incendiary, or a deadly or dangerous weapon on or about each individual’s person or accessible property...”
- (kk) threats or statements by Usama bin Laden to strike a significant U.S. target and/or to bring down U.S. aircraft and hijack them
- (ll) any entries in the *Federal Register* concerning Aviation Security
- (mm) any FAA intelligence case file
- (nn) the TIPOFF terrorist watchlist.
- (oo) The December 24, 1994 hijacking of Air France Flight 8969 in Algiers, Algeria
- (pp) The July 24, 1999 cockpit intrusion aboard All Nippon Airways Flight 61 from Tokyo, Japan
- (qq) The April 25, 2001 stabbing of a passenger boarding a United Airlines flight at San Francisco International Airport including but not limited to all documents in the case of *Linda Uptegrove v. United Airlines, Inc. and Argenbright Security, Inc.*, CV 01-1455 ST, United States District Court for Oregon

13. All documents concerning communications from the FBI or the FAA during the two years prior to September 11, 2001 concerning Aviation Security.

14. All documents concerning the airspace restrictions imposed in Italy in the Summer of 2001, including all documents concerning the reasons for such restrictions.

15. All documents concerning the airspace restrictions imposed in connection with the Olympic Games in Atlanta, Georgia, including all documents concerning the reasons for such restrictions.

16. All documents concerning your identification on or after September 11, 2001 of individuals suspected to be involved in any way in the hijacking of the Hijacked Airplanes.

17. All documents concerning any reference to any FAA minimum or “bare minimum” concerning Aviation Security.

18. All documents concerning the use of “common sense,” a “reasonable determination” or discretion with respect to security screening on or before September 11, 2001.

19. All documents concerning any reference to any portion of the ACSSP as setting forth “only guidelines.”

20. All documents concerning your ability to implement Aviation Security procedures that differ from those provided in the Checkpoint Operations Guide or ACSSP.

21. All documents concerning any person having contact or communications with the 9/11 Terrorists on September 11, 2001, including all documents concerning 9/11 from the files of any such person.

22. Documents reflecting all communications between you and the ATA concerning Aviation Security during the ten year period preceding September 11, 2001.

23. All documents concerning any original or duplicate document given to any person on or after September 11, 2001 concerning 9/11 and a copy of such original or duplicate document.

24. All documents concerning screener turnover at the Subject Airports during the five years prior to September 11, 2001.

25. All documents concerning the "continuous" and "random" screening, or lack thereof, at the Security Checkpoints on September 11, 2001.

26. All documents concerning your instructions to checkpoint screeners to conduct "continuous" and "random" screening at any point prior to September 11, 2001.

27. Produce for inspection, testing and photographing all Tangible Things involved in the screening of any 9/11 Terrorist on September 11, 2001.

28. All documents concerning the testing, calibration or repair of any Tangible Thing involved in the screening of any 9/11 Terrorist on September 11, 2001.

29. All documents concerning the FAA Boston Civil Aviation Security Field Office report and testing of equipment at the Security Checkpoints at Logan.

30. All documents concerning weapons disguised as everyday items, including cigarette lighters, concerning 9/11.

31. All documents concerning any investigative or press reports concerning Aviation Security at any Subject Airport on or before September 11, 2001.

32. All documents concerning prior travel by any of the 9/11 Terrorists on any of your aircraft or flights prior to September 11, 2001, including all documents concerning the travel of Mohamed Atta and other "Middle Eastern looking individuals" on

Flight 11 in or around the Fall of 2000 (*see* AAL 004767). Produce for inspection, testing and photographing the cockpit voice recorder and/or flight data recorder for such flight.

33. All documents concerning Threatening Items found onboard any of your aircraft during the 30 days prior to and following after September 11, 2001.

34. All documents concerning communications with or involving the Hijacked Airplanes, or any person aboard the Hijacked Airplanes, on September 11, 2001.

35. All documents concerning the cockpit voice and/or flight data recorders for the Hijacked Airplanes.

36. Produce for inspection, testing and photographing the cockpit voice and/of flight data recorders for the Hijacked Airplanes.

37. All documents concerning any Threatening Items aboard the Hijacked Airplanes, including all documents concerning the manner in which such Threatening Items were brought on board.

38. All documents concerning any portion of the Hijacked Airplanes, or any Tangible Thing onboard or suspected or believed to have been onboard the Hijacked Airplanes located, viewed or recovered on or after September 11, 2001.

39. Produce for inspection, testing and photographing any portion of the Hijacked Airplanes, or any Tangible Thing onboard or suspected or believed to have been onboard the Hijacked Airplanes, located, viewed or recovered on or after September 11, 2001.

40. All documents in your possession, custody or control on or prior to September 11, 2001, or concerning documents in your possession, custody or control at any time on or prior to September 11, 2001, concerning mace, pepper spray or similar personal

protection sprays, tear gas, knives with serrated edges, menacing knives, fake bombs, razor blades, razor knives or box cutters.

41. All documents concerning any item suspected to belong any 9/11 Terrorist recovered in or proximate to any of the Subject Airports, including weapons or other items concerning any 9/11 Terrorist recovered from any automobile parked at or proximate to any of the Subject Airports.

42. Produce for inspection, testing and photographing any item suspected to belong to any 9/11 Terrorist recovered in or proximate to any of the Subject Airports, including weapons or other items recovered from any automobile concerning in or proximate to any of the Subject Airports concerning any 9/11 Terrorist.

43. All documents concerning any incident or incident report prior to September 11, 2001 involving mace, pepper spray or similar personal protection sprays, tear gas, knives with serrated edges, menacing knives, fake bombs, razor blades, razor knives or box cutters, including all documents concerning an incident on or around January 31, 2001 in which a passenger entered, or attempted to enter, a security checkpoint at Logan with a box cutter inside his jacket pocket.

44. A copy of all signs or documents relating to Aviation Security, including signs or documents relating to items prohibited or allowed on board aircraft, posted at or near the Security Checkpoints on September 11, 2001.

45. Produce for inspection and photographing the original of all signs or documents relating to Aviation Security, including signs or documents relating to items prohibited or allowed on board aircraft, posted or located at or near the Security Checkpoints on September 11, 2001.

46. All photographs or other images of the Security Checkpoints taken on or within 60 days prior to or following September 11, 2001.

47. The Checkpoint Operations Guide located at the Security Checkpoints on September 11, 2001.

48. All documents concerning the drafting of or changes or modifications to the Checkpoint Operations Guide from January 1, 1999 to September 11, 2001.

49. All documents concerning the creation or development of the Checkpoint Operations Guide or the ACSSP.

50. All documents concerning the manner in which the 9/11 Terrorists gained access to the cockpit of the Hijacked Airplanes.

51. All documents concerning, in words or in substance, the ability to open cockpit doors with any item, including hotel mini-bar keys.

52. All documents concerning, in words or in substance, the ability of the cockpit doors aboard any of your aircraft manufactured by Boeing to withstand forced or unauthorized entry.

53. All documents concerning the cost of designing or installing reinforced or hardened cockpit doors on any of your aircraft.

54. All documents concerning communications between you and Boeing concerning cockpit door design prior to September 11, 2001.

55. All documents concerning airplane systems designed to prevent or avoid collision by your aircraft with structures or obstacles on the ground prior to September 11, 2001.

56. All documents concerning, in words or in substance, any instruction to pilots or flight crews to keep cockpit doors closed or locked during flight or during a hijacking, or to “keep aggression out of the cockpit.”

57. All documents concerning, in words or in substance, any instruction to aircraft crews to guard cockpit keys.

58. All documents concerning the requirements of 14 C.F.R. § 121.587 and 14 C.F.R. § 121.313, including all documents concerning your compliance with these requirements on or prior to September 11, 2001.

59. All documents concerning graffiti in or on any of the Hijacked Airplanes on September 11, 2001 or at any point during the 30 days prior to September 11, 2001 (*see* AAL 04684).

60. All photographs or video images of the 9/11 Terrorists at any Subject Airport on September 11, 2001.

61. All documents concerning the absence of security cameras at the Logan checkpoints on or prior to September 11.

62. All documents concerning the threat level or alert level at the Subject Airports on September 11, 2001.

63. All documents concerning the threat level or alert level at the Subject Airports during the five years prior to September 11, 2001.

64. All documents concerning additional screening procedures to be performed on CAPPS selectees on September 11, 2001 in light of the threat level or alert level at the Subject Airports on that date.

65. All documents concerning communications between you and any named defendant in the September 11 Actions concerning Aviation Security during the ten year period prior to September 11, 2001.

66. All documents concerning communications between you and any named defendant in the September 11 Actions concerning Aviation Security or 9/11 on and during the three months following September 11, 2001.

67. All documents received from, or concerning communications with, any governmental agency concerning Aviation Security during the twelve months preceding September 11, 2001.

68. All documents concerning persons with access to the Hijacked Airplanes at the Subject Airports on September 10 or September 11, 2001.

69. A complete copy of all Insurance Policies.

70. All documents concerning communications with or involving any Insurance Carrier concerning 9/11.

71. All documents provided by you to the 9/11 Commission or received by you from the 9/11 Commission.

72. All documents received by you from any person concerning the 9/11 Commission.

73. All documents concerning communications between you and the 9/11 Commission.

74. All documents provided by you to the Gore Commission or received by you from the Gore Commission.

75. All documents received by you from any person concerning the Gore Commission.
76. All documents concerning communications between you and the Gore Commission.
77. All documents provided by you to the Congressional Joint Inquiry or received by you from the Congressional Joint Inquiry.
78. All documents received by you from any person concerning the Congressional Joint Inquiry.
79. All documents concerning communications between you and the Congressional Joint Inquiry.
80. All documents that you may use to support your defenses in the September 11 Actions, unless solely for impeachment, within Fed. R. Civ. P. 26(a)(1)(B).
81. All documents concerning the selectee status of each of the 9/11 Terrorists.
82. All documents concerning the screening of each of the 9/11 Terrorists.
83. All documents concerning Aviation Security and knives with blades of four inches or less.
84. All screener training videos created on or prior to September 11, 2001.
85. All anti-hijacking training videos created on or prior to September 11, 2001.
86. All documents concerning violations, fines or penalties concerning checkpoint screening prior to September 11, 2001 or arising out of or relating to 9/11.

87. All documents concerning FAA assessments or testing at the Security Checkpoints, prior to September 11, 2001, including all FAA assessments at Logan checkpoints B5 and B4.

88. All FBI, FAA, NTSB or TSA documents or reports concerning 9/11 in your possession, custody or control.

89. All documents concerning any interview or investigation conducted by the FBI or any law enforcement agency concerning 9/11 in your possession, custody or control.

90. All documents concerning bags checked by any 9/11 Terrorist on September 11, 2001, including all documents concerning items found in any baggage checked by Atta on September 11, 2001. Produce for inspection, testing and photographing all baggage checked by Atta on September 11, 2001.

91. All documents concerning the entry, exit or presence of automobiles associated with the 9/11 Terrorists at Logan's parking facilities, including all surveillance videos from Logan's parking facilities on or prior to September 11, 2001.

92. All documents concerning communications between or among your officers, employees or agents or between or among your officers, employees or agents and any other person concerning 9/11 on September 11, 2001.

93. Documents sufficient to identify the first moment you became aware or had reason to suspect the possible or actual hijacking of any aircraft on September 11, 2001.

94. All documents concerning FAA security briefings at Newark on or around March 14, 2001, Dulles on or around March 22, 2001 and Logan on or around May 15, 2001.

95. All documents concerning communications between you and your pilots or In-Flight Security Coordinators concerning Aviation Security during the year prior to September 11, 2001.

96. All FAA Security Directives issued on or prior to September 11, 2001.

97. All documents related to security risk assessments performed by Counter Technology Inc. ("CTI") at Boston Logan International Airport prior to September 11, 2001.

98. All documents concerning CAPPS procedures, including but not limited to all correspondence related to its initial implementation, instruction manuals, training materials, internal audits, correspondence with the FAA on the subject and all documents concerning the designation of certain 9/11 Hijackers as CAPPS selectees.

99. All documents concerning procedures for passenger profiling of international and domestic passengers from 1985 through 2001. Such documents shall include all proposals for conducting a profiling system for domestic flights even if such proposals were rejected.

100. All documents concerning the procedure to be followed when an international or domestic passenger was determined to be a CAPPS selectee.

101. All training videos produced by the ATA, including but not limited to videos produced jointly by the ATA and FAA.

All security audits of United Airlines and American Airlines checkpoints at Washington Dulles International Airport, Boston Logan International Airport and Newark International Airport from 1999 through September 11, 2001, including but not limited to station visit evaluations and station visit checklists.

Dated at New York, New York

March 20, 2006

PD/BL PLAINTIFFS' EXECUTIVE  
COMMITTEE

By: 

Robert A. Clifford  
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PD/BL Plaintiffs' Liaison Counsel  
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Defendants' Liaison Counsel

Richard Williamson, Esq.  
Ground Defendants' Liaison Counsel

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7 WTC Ground Defendants' Liaison Counsel

**EXHIBIT A**

<b>Document:</b>	<b>Dated on or around (where available):</b>
2001 CD Rom Terrorism Threat Presentation to Aviation Security Personnel at Airports and Air Carriers	2001
FAA briefing materials, The Transnational Threat to Civil Aviation	2001
FAA report, Record of Air Carrier Briefings – 4/18/01 to 9/10/01	2001
All Surveillance Videos of the Portland Security Checkpoint on September 11, 2001	9/11/2001
Assessment and Testing Data for BOS, EWR and IAD	10/24/2001
Assessment and Testing Data for BOS, EWR and IAD	9/21/2001
American Airlines Response to Commission Questions For The Record	3/15/2004
American Airlines Response to Commission Questions For The Record	4/15/2004
American Airlines Response to Commission Questions For The Record	4/26/2004
American Airlines Response to Commission Questions For The Record	7/7/2004
Dispatch Environmental Control/Weekly Flight Summary for Flight 11, Sept. 11, 2001	
Schematic of 767 Aircraft	Undated
Passenger Name List Flight 11/September 11	Undated
American Airlines Response to Commission's Supplemental Document Requests	1/20/2004
American Airlines Flight Standards Manual	In effect on 9/11/2001
American Airlines System Operations Control Interview	1/8/2004
NTSB Report, Air Traffic Control Recording – American Airlines Flight 11	12/21/2001
American Airlines transcript of telephone call from Betty Ong to Nydia Gonzalez, September 11, 2001	
American Airlines transcript of telephone call from Nydia Gonzalez to Craig Marquis, September 11, 2001	
FAA document, Full Transcript; Aircraft Accident; AAL 11; New York, NY; September 11, 2001	2/15/2002
FBI report, American Airlines Airphone Usage	9/20/2001
American Airlines transcript of telephone call from AAL System Operations Control to Boston FAA Air Traffic Control Center, Sept. 11, 2001	
Michael Woodward handwritten notes	9/11/2001
Interview of Michael Woodward	9/11/2001
American Airlines System Operation Command Center Chronology for September 11, 2001	1/15/2002
American Airlines transcript of telephone call from Nancy Wyatt to Ray Howland, September 11, 2001	

NTSB report, Flight Path Study – American Airlines Flight 11	2/19/2002
American Airlines transcript of telephone call from AAL system operations control to FAA Air Traffic Control System Command Center, September 11, 2001	
Michael Woodward interview concerning Flight 11 Account of Events	9/19/2001
United Flight 175 – 11Sep01 Passenger ACI Check-in History	7/11/2002
United Airlines Response to Commission Questions for the Record	5/13/2004
United Airlines Response to Commission Questions for the Record	7/13/2004
United Flight 175: Flight Attendant Positions/Jumpseats	Undated
United Report, Flight 175, Flight Data Recap	
United Airlines flight operations briefing	11/20/2003
FAA document, Full Transcript; Aircraft Accident; UAL 175; New York, NY; September 11, 2001	9/17/2001
FAA document, Full Transcript; Aircraft Accident; UAL 175; New York, NY; September 11, 2001	5/8/2002
FAA document, Full Transcript; Aircraft Accident; UAL 175; New York, NY; September 11, 2001	1/17/2002
FAA document, Full Transcript; Aircraft Accident; UAL 175; New York, NY; September 11, 2001	10/14/2003
FAA document, Full Transcript; Aircraft Accident; UAL 175; New York, NY; September 11, 2001, FAA Boston Center, position 47R	
FAA document, Full Transcript; Aircraft Accident; UAL 175; New York, NY; September 11, 2001, FAA New York Center, position 42R	
FAA document, Full Transcript; Command Center; NOM Operational Position; September 11, 2001	10/14/2003
NTSB report, Air Traffic Control recording – United Airlines Flight 175	12/21/2001
FBI report of investigation, air phone records for flights 93 and 175 on Sept. 11, 2001	9/18/2001
United Air Lines Letter from Jeff Plantz to Assistant United States Attorney David J. Novak	7/31/2002
Notes of Marc Policastro	9/11/2001
FBI report of investigation, interview of family member related to call	9/12/2001
United report, September 11, 2001 Timeline	
FAA report, Executive Summary Chronology of a Multiple Hijacking Crisis, September 11, 2001	9/17/2001
NTSB Report, Flight Path Study – United Flight 175	2/19/2002
FBI report of investigation, interview of Julie Sweeney	10/10/2001
FBI report of investigation, interview of Louise Sweeney	9/28/2001
United Airlines report, Flight 175 ACARS	
United Airlines Explanation of SAMC Phone Records for Calls to United WHQ	7/16/2004
United Airlines System Operations Control Center personnel interview	11/21/2003
United Airlines System Operations Control Center briefing	11/20/2003
FBI report of investigation, interview of Lee Hanson, Sept. 11, 2001	
Notes of Lee Hanson concerning 9/11	9/11/2001

United Airlines Report, Mike Barber September 11, 2001 timeline	
United Airlines report, Timeline for Dispatch/SMFDO Activities – Terrorist Crisis”	Undated
UAL Timeline for Operational Messages ATC/UAL – Terrorist Crisis	9/11/2001
United Airlines Weight and Balance Information: Flight 175:2001-09-11	
FBI document, Summary of Pentagon Investigation	1/31/2003
FAA Flight Standards Service briefing	1/13/2004
Usama Bin Laden/World Islamic Front Hijacking Threat	1998 and 1999
FAA response to Congressional Joint Inquiry Staff letter dated 11/6/02	2/4/03
Civil Aviation Security Threat and Security Assessment Procedures and Matrix in effect on 9/11/01	
Rand-St. Andrews University Chronology of Terrorist Acts	
FAA report, Criminal Acts Against Civil Aviation, 2000	
FAA report, Civil Aviation Security Reference Handbook	May 1999
FAA report, Total Architecture for Aviation Security	June 2001
FAA report, Civil Aviation Security Handbook	May 1999
Usama Bin Ladin/World Islamic Front (WIF) Threat to U.S. Civil Aviation	9/15/98
Usama Bin Ladin/World Islamic Front Threat to U.S. Civil Aviation	July 1999
Usama Bin Ladin/World Islamic Front Hijacking Threat	8/4/99
FAA Report, the Threat to U.S. Civil Aviation in the United States	September 1994
FAA Office of Civil Aviation Security Policy and Planning, Evaluation of Checkpoint Screening Performance 10/1/1998 to 9/20/2000	
FAA report, Special Activities Staff, ACS-50, Security Checkpoint Screening	
Intelligence report interrogation of Ramzi Binalshibh	10/1/2002
United Airlines Instructional Video, Hijacking Cope and Survive	1984