

By signing this permit application:

1. I confirm that there will be no solicitation performed by those carrying out this activity.
2. The applicant agrees to abide by all the terms and conditions of the Allegheny County Airport Authority Leafletting and other Speech-Related Activity Permit Guidelines (**attached herein**).
3. The facts set forth in this application are true and correct. Any materially false statement are grounds for revocation of the permit.

(Signature of Permit Applicant)

**ALLEGHENY COUNTY AIRPORT AUTHORITY LEAFLETING AND
OTHER SPEECH RELATED ACTIVITY PERMIT
GUIDELINES**

The following Guidelines have been established for the issuance of permits for authorized non-solicitation leafletting, displaying of signs, signature gathering, conducting of surveys and other speech-related activities at the Pittsburgh International Airport (“Airport”). These Guidelines have been established for the purposes of ensuring the smooth operation of the Airport and meeting the primary responsibility of facilitating air travel. The Airport is not a public forum, and the Allegheny County Airport Authority (“ACAA”) seeks to avoid and minimize unnecessary disruption to the traveling public and the employees at each Airport.

1. Any person or organization that has been granted a permit must comply with the ACAA’s and FAA’s policies, guidelines, rules, and regulations, along with all other applicable state and federal laws. Failure to comply will result in the cancellation of the permit and restrictions on future permits.
2. Prohibited activities include, but are not limited to: (i) immediate solicitation of donations or contributions of funds, goods, or services; (ii) distribution of samples, food, or drink; (iii) advertising for any service, product, or organization other than through a permitted advertising contract with the ACAA or its advertising firm; (iv) the sale or offer for sale of any goods, services, merchandise, subscriptions, tickets, food, beverage, or any other thing; and (v) all related activities.

Excluded from these guidelines are musicians selected by the ACAA to perform at the Airport as part of the Arts and Culture programs. Tips may not be solicited by musicians while performing at the Airport. Tapes, CDs, or promotional materials may be offered for sale by selected musicians, and musicians may make available free materials such as business cards, brochures, etc. that will encourage the public to contact performers for these materials at a later time. If tips are solicited, musicians will not be paid for the performance and will not be scheduled for future performance opportunities.

3. Activities are prohibited if they include: (i) loud language, noise, or any amplification or noise making device; (ii) intentionally grabbing, restraining, or in any way intimidating any person being approached; (iii) repeatedly attempting to give literature to any person who has indicated that such person does not wish to accept literature; (iv) in any manner misrepresenting to the public the true identity of the organization he or she represents; (v) attaching any sign, circular, or other written material to any wall, booth, post, counter, or other surface; (vi) language that incites violence or disparages a person or particular group of people; (vii) shockingly graphic depictions; (viii) disrupting the free and orderly flow of pedestrian traffic through the Airport; (ix) leaving any literature unattended; (x) wearing a sign or carrying a placard larger than one foot by one foot in size; or (xi) interfering with the transportation or business functions of the Airport, including interfering with the progress of Airport tenants.
4. If a permit request includes signage or the distribution of literature, a proposed rendering of the sign or copy of such literature must be submitted with the permit application and is subject to the prior approval of ACAA. The ACAA will not approve submissions that are deemed inappropriate for public display. Submissions of any of the forgoing shall be made no fewer than 14 calendar days prior to the date that the permit applicant intends to use the same. Approval of any such disseminated or displayed items is solely within the judgment of the ACAA; provided, however, the ACAA

shall not exercise any discretion or judgment regarding the purpose or content of the proposed activity, except as provided in these Guidelines. The issuance of a permit is a strictly ministerial function and does not constitute an endorsement by the ACAA of any organization, cause, religion, political issue, or other matter.

If the distribution of literature is approved as part of the permit request, the permit holders may not directly approach passers-by in order to distribute such literature.

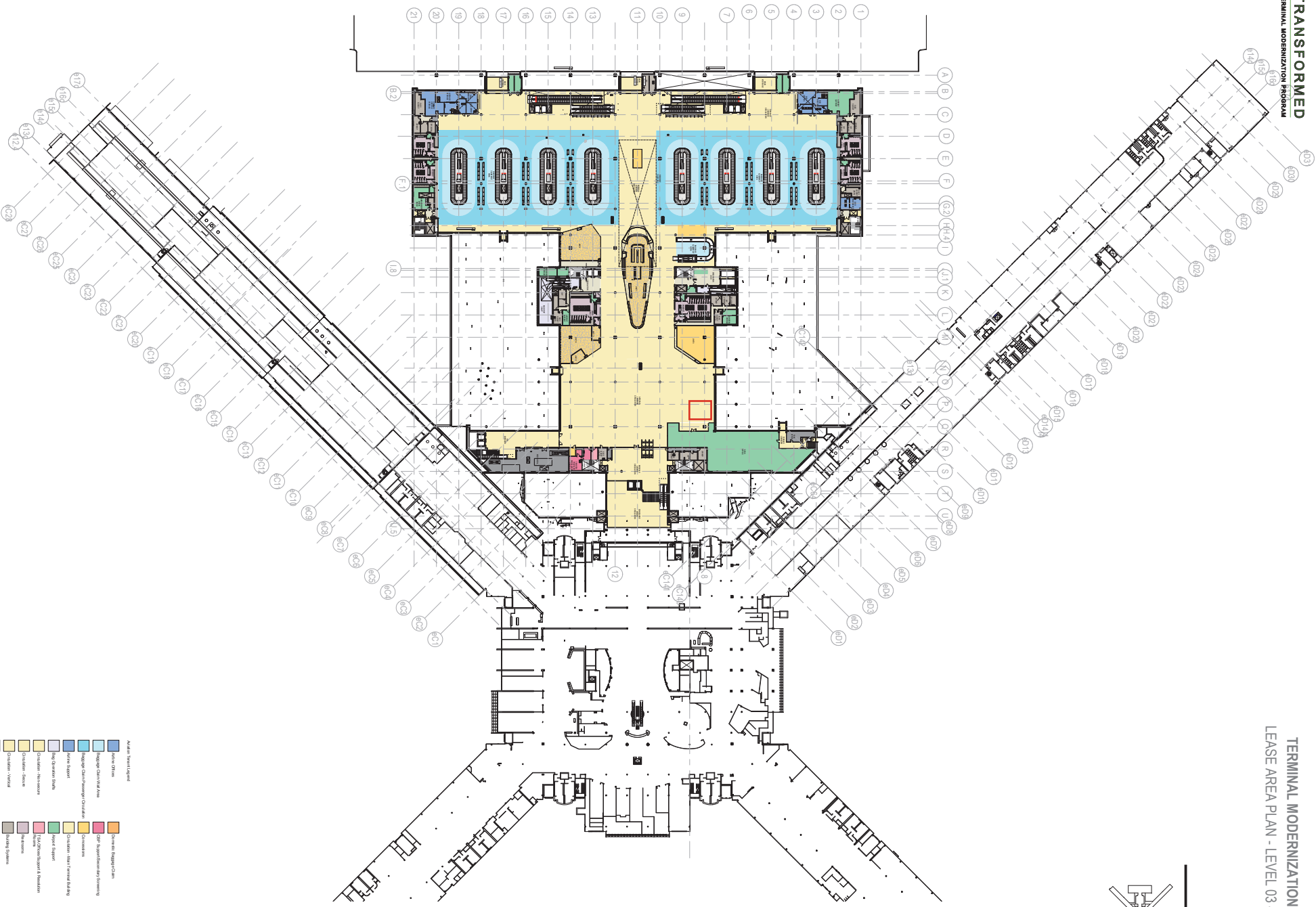
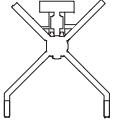
5. The ACAA requires no fewer than 14 calendar days to review a Permit application. Permits are issued for no more than a 14-day consecutive period and are renewable. Permits may be subject to date and time restrictions as deemed necessary by the ACAA due to increased operational periods or security concerns. Permits shall be issued on a first-come, first-served basis. If there is no space available, then the applicant can choose to place his or her name on a waiting list. The person(s) on such waiting list will be granted preference in order of application date and as space becomes available. **Permits are non-transferrable.**
6. Three locations are designated for purposes permitted by these Guidelines in the Landside building of the Pittsburgh International Airport (see attached maps). The locations are evenly distributed on each level.
7. One location will be granted per Permit application. Each site is limited to a 10' x 10' area. All persons and activities must remain within the boundary set forth in the Permit, and the site is not to be occupied by more than five people at a time. If requested, the ACAA will provide and set-up one (1) table and/or up to five (5) chairs. Permit holders who request tables and/or chairs are required to contact the ACAA via email to TSoubie@flypittsburgh.com or TKelly@flypittsburgh.com upon completion of the activity. Failure to contact the ACAA may result in denial of future Permits. The ACAA will not provide additional set-up or break-down assistance for permit holders.
8. To prevent the uninterrupted flow of Airport pedestrian traffic, permits will be limited to the location assigned. The ACAA may move expressive activity from one location to another and/or disperse such activity around the airport upon reasonable notice to each affected person when, in the judgment of the ACAA, such action is necessary for the efficient and effective operation of the transportation function of the Airport.
9. Approved permits will be emailed or faxed to an address or phone number designated by the applicant. **Please display the permit at the designated site for the duration of activities at the Airport and be prepared to present it at any time on request by an ACAA or Allegheny County Police Department or ACTS staff member.** Engaging in activities as described herein without a permit obtained in accordance with these Guidelines is prohibited.
10. ACAA reserves the right to cancel a permit, without prior notice, in the event ACAA determines that any of the preceding provisions have been violated. ACAA reserves the right to suspend a permit if it is necessary to do so to facilitate passenger flow, address safety or security concerns, facilitate the conduct of Airport business, or address any other concern.

If you have any questions regarding these Guidelines, please contact Tyler Soubie at the Allegheny County Airport Authority at (412) 472-3855.

1" = 40'-0"

0 20 40

KEY PLAN



Arrival Gates	Customs Baggage Claim
Baggage Claim/Transfer Area	Air Support/Inventory Inventory
Baggage Claim/Transfer/Customs	Construction
Arrival Gates	Construction - Main Terminal Building
Bag/Transfer/Baggage	Core Elevator
Customs - Storage	Core/Check-in/Baggage/Security/Baggage
Customs - Visual	Elevators
Customs - Support	Stairing System
	Materials

Allegheny County Airport Authority
Policy Regarding Free Speech and Other Activities

ARTICLE I - GENERAL

1. Adoption. This Allegheny County Airport Authority (the Authority) Policy Regarding Free Speech and Other Activities (“Free Speech Policy”) is adopted by the Authority as of November 18, 2025 (“Effective Date”). To the greatest extent possible, this Free Speech Policy shall be read in tandem with the Pittsburgh International Airport Rules and Regulations, as amended (“Rules and Regulations”). In the event of any inconsistencies between this Free Speech Policy and the Rules and Regulations, the more specific provision shall govern.

2. Applicability. This Free Speech Policy applies to all persons and entities entering upon or using the Airport to conduct First Amendment Activities as defined herein.

3. Purpose. The Authority’s primary objective in operating the Airport is to provide passengers and other Airport users with a safe, secure, and customer-focused traveling experience. As a government proprietor, the Authority recognizes its obligation to permit certain First Amendment Activities at the Airport.¹ However, the Authority also recognizes that it may impose reasonable restrictions on those First Amendment Activities to ensure continued operation of the Airport and to provide the traveling public with a safe and efficient transportation facility.² Accordingly, by adoption of this Free Speech Policy, the Authority provides designated space for First Amendment Activities, and restricts the time, place and manner in which First Amendment Activities may occur in or on the Airport in order to ensure the safe and orderly use of the Airport by travelers and Airport employees.

4. Definitions. The following terms as used in this Free Speech Policy shall have the following meanings:

(a) “Commercial Solicitation” shall mean the oral or written request for funds, signatures or anything of value conducted by a person to or with passers-by in a continuous and repetitive manner, including without limitation offering any property or service for sale. This definition is not intended to include the advertising of pricing information.

(b) “Chief Operations Officer” shall mean the person to have primary responsibility for overseeing operations, security, and maintenance for the Authority.

¹ Generally, government entities may not completely prohibit all First Amendment Activities at public airports. *See Bd. of Airport Comm’rs of City of Los Angeles v. Jews for Jesus, Inc.*, 482 U.S. 569 (1987) (finding that a resolution banning “First Amendment activities” in the terminal area was facially unconstitutional under the First Amendment’s overbreadth doctrine and unconstitutionally vague).

² The United States Supreme Court has held that an airport terminal owned and operated by a governmental entity is a “nonpublic forum.” *International Society for Krishna Consciousness, Inc. v. Lee*, 505 U.S. 672 (1992). In nonpublic forums, the government proprietor may impose “reasonable” restrictions to preserve the property’s functions so long as they are “viewpoint-neutral.” *Cornelius v. NAACP Legal Defense & Educ. Fund, Inc.*, 473 U.S. 788, 806 (1985).

(c) “Expressive Activity Areas” shall mean the following areas at the Airport: the designated 10 x 10 areas on the north end of the departures curb, the north side of the arrivals level adjacent to the terrace entry, and the south end of the ground transportation level as shown on the Permit Application.

(d) “First Amendment Activity” shall mean conducting or participating in any form of demonstration, including picketing, parades, marches, sit-ins and public assemblies; distributing pamphlets, books or other written, printed or graphic material; or other activity protected by the First Amendment to the U.S. Constitution and conducted with or directed towards passers-by in a continuous or repetitive manner.

(e) “Permit Coordinator” shall mean a person designated by the Authority or the Chief Operations Officer with authorization to review and approve or deny applications for permits under this Free Speech Policy, and to cancel, suspend, or impose conditions upon any issued or active permits under this Free Speech Policy.

(f) “Terminal” shall mean the building and related facilities designed to provide passenger amenities and services related to the enplaning and deplaning of passengers and the operation of air travel at the Airport and includes appurtenant sidewalks and roadways. Terminal shall include both the commercial airline terminal and general aviation terminal.

ARTICLE II - NON-COMMERCIAL / FIRST AMENDMENT ACTIVITIES

1. Airport’s Purpose. The primary purpose of the Airport is to provide for the safe, secure and efficient transportation of passengers by air and to provide passenger and airline amenities and services related to the enplaning and deplaning of passengers and the operation of airlines. The Airport, the Terminal, and its adjacent sidewalks and parking areas are not public fora. By permitting limited First Amendment Activities in the Expressive Activity Areas in accordance with this Policy, the Authority does not intend for the any portion of the Airport to become a public forum for dissemination, debate, or discussion of political, social, or religious issues.³

2. Permit Required. Any person seeking to conduct or participate in a First Amendment Activity must do so from, in, or upon the Expressive Activity Areas, and shall submit a permit application to the Permit Coordinator to do so no later than two (2) weeks before the proposed before the proposed First Amendment Activity.⁴ The permit application is available on the Authority’s website at <https://flypittsburgh.com/aaa-corporate/partner-with-us/forms-guidelines/> and are also attached as Appendix A to this Free Speech Policy.

³ The designation of specific areas at a public airport for the expression of free speech is typically permissible, *see ISKCON Miami, Inc. v. Metro. Dade Cty.*, 147 F.3d 1282 (11th Cir. 1998), and does not generally result in the creation of a public forum (as opposed to a “nonpublic forum”) in those areas. *See Stanton v. Fort Wayne-Allen Cty.*, 834 F. Supp. 2d 865 (N.D. Ind. 2011).

⁴ Several courts have held that requirements for speakers to obtain permits in advance of First Amendment activities at airports are reasonable. *See, e.g., McDonnell v. City & Cty. of Denver*, 238 F. Supp. 3d 1279 (D. Colo. 2017), *rev’d in part*, 878 F.3d 1247 (10th Cir. 2018); *Jews for Jesus, Inc. v. Port of Portland*, 2005 WL 1109698 (D. Or. 2005), *aff’d*, 172 F. App’x 760 (9th Cir. 2006).

3. Review of Application. The Permit Coordinator shall review each application on a first-come, first-served basis, and within three (3) business days following receipt of the application by the Permit Coordinator issue a permit, or else furnish the applicant with a written statement setting forth the reason for the application's denial. The Permit Coordinator may deny an application to conduct a First Amendment Activity **only** for the following reasons:⁵

- (a) The applicant has not complied with this Free Speech Policy;
- (b) The applicant has made false statements in the application;
- (c) The applicant (including any partner, officer, director, or trustee) or an agent thereof has had a permit revoked by the Authority for a violation of this Free Speech Policy or the conditions of such permit within the preceding sixty (60) days;
- (d) The proposed activity is for Commercial Solicitation⁶ or does not constitute protected free speech;
- (e) The subject matter (not the viewpoint) or mechanism of the proposed activity would (i) incite riots or crime, (ii) constitute fighting words, (iii) be lewd, (iv) be obscene, or (v) be otherwise unreasonably disruptive of normal Airport operations;⁷
- (f) There is no space in a designated Expressive Activity Area available for the proposed activity during the time and date requested; or
- (g) The proposed First Amendment Activity cannot safely be accommodated at the Airport during the requested time period.

4. Conditions of Issuance. Permission granted by the Authority to enter upon and/or use the Airport, Terminal, or any portion thereof to conduct First Amendment Activities shall be conditioned upon compliance with all applicable federal, state, and local laws and regulations, as well as the Rules and Regulations and this Free Speech Policy. The Permit Coordinator may verify the truthfulness and completeness of the information provided on the application and may impose specific requirements for the exercise of the proposed First Amendment Activity to prevent interference with Airport operations, safety, security, and ingress and egress from the Airport, Terminal, and adjacent areas.

⁵ As noted above, restrictions on First Amendment activities in nonpublic forums cannot be made based on the viewpoints of the speaker(s) (i.e., they must be "viewpoint neutral"). See *Rosenberger v. Rector and Visitors of the Univ. of Va.*, 515 U.S. 819, 829 (1995). Thus, grounds for permit denial in this Free Speech Policy must generally be based on time, place, and manner considerations.

⁶ Courts have upheld prohibitions on commercial solicitation at airports. *ISKCON Miami, Inc. v. Metro. Dade Cty.*, 147 F.3d 1282, 1288 (11th Cir. 1998) (concluding that "regulations prohibiting solicitation and sale of literature at MIA are reasonable restrictions on speech that withstand appellants' constitutional challenge").

⁷ While a government proprietor cannot limit First Amendment activities based on viewpoint, "it *can* exclude speakers on the basis of their subject matter so long as the distinctions drawn are...reasonable in light of the purpose served by the [nonpublic] forum." *Stanton v. Fort Wayne-Allen County*, 834 F. Supp. 2d 865, 872 (N.D. Ind. 2011) (emphasis added).

5. Permit Appeals. At the option of the applicant or permittee, the decision of the Permit Coordinator or Director, Landside and Terminal Operations denying, revoking, or suspending a permit may be appealed to the Chief Operations Officer. The Chief Operations Officer's decision on appeal shall be final.

6. Permit Contents and Duration. Permits shall bear the name and address of the permit holder conducting the First Amendment Activity, and the location at which the First Amendment Activity is authorized and shall be displayed by the permit holder at all times that the permit holder is undertaking First Amendment Activities at the Airport.⁸ Permits may not be issued for a time period in excess of fourteen (14) calendar days but may be renewed. .

7. Identification. All participants in First Amendment Activities must be able to present a valid permit to any police officer or Authority employee upon request.

8. Authority to Relocate. The Permit Coordinator or Director, Landside and Terminal Operations may direct participants in First Amendment Activities to move from one location to another at the Airport and/or disperse such activity upon reasonable notice to the participants when, in the judgement of the Permit Coordinator or Director, Landside and Terminal Operations, such action is necessary or desirable for the safety, security, or efficiency of the transportation function of the Airport.

9. Suspension or Revocation of a Permit. The Permit Coordinator or Director, Landside and Terminal Operations, or Chief Operations Officer may suspend or revoke a permit without notice in the event of an emergency or situation that adversely affects safety of persons or property, when necessary to implement required emergency security procedures, or for a violation of the terms and conditions of the permit or this Free Speech Policy.

10. Standards of Conduct.

(a) No person engaged in a First Amendment Activity may physically or verbally obstruct, delay, harass, intimidate, or interfere with the free movement of any person in, at or on the Terminal or the Airport;

(b) First Amendment Activities shall be undertaken only by those persons with a valid permit during the times and within the areas designated by the Permit Coordinator and specified in the permit;

(c) First Amendment Activities shall not be permitted in those portions of the Airport or Terminal that are not open to the general public, including sterile areas;

(d) No person may engage in First Amendment Activities within ten (10) feet of any person waiting in line or any person loading and unloading baggage;

⁸ Stringent permitting and identification requirements for First Amendment activities in airports have been upheld by courts as proper time, place, and manner restrictions because of the "significant governmental interests in the need to ensure passenger safety, traffic flow, and airport security," particularly after September 11, 2001. *Jews for Jesus, Inc. v. Port of Portland, Or.*, CV04695HU, 2005 WL 1109698 at *9 (D. Or. May 5, 2005) *aff'd sub nom. Jews for Jesus, Inc. v. Port of Portland*, 172 F. Appx. 760 (9th Cir. 2006).

(e) Use of sound or voice amplifying apparatuses in or adjacent to the Terminal, whether electronic or by other means, is prohibited;

(f) Tables, stands, chairs, or other structures shall not be placed in or on the Airport, with exception of those tables and chairs provided by the Authority;⁹

(g) No person shall intentionally leave any items unattended, including those intended for distribution to passersby.

(h) Persons participating in First Amendment Activities must obey all directions of police officers and Authority staff in order to facilitate movement of Airport customers and traffic in to and from the Airport, Terminal, and adjacent walkways and roadways; and

(i) All signs used in connection with First Amendment Activities shall be no larger than twenty-two (22) inches by twenty-eight (28) inches and shall not be supported by sticks or other rigid holders.¹⁰

ARTICLE III - MISCELLANEOUS

1. Amendments. This Free Speech Policy may be amended as necessary or appropriate by the Authority at any time and for any reason, without prior notice. Any revisions or amendments to this Free Speech Policy shall be in writing and supplied to all current permit holders. A member of the public may obtain a current copy of this Free Speech Policy from the <https://flypittsburgh.com/aaa-corporate/partner-with-us/forms-guidelines/> website or the Director, Landside and Terminal Operations, during normal business days and hours.

2. Severability. Should any portion of this Free Speech Policy be declared unlawful or unconstitutional, the remaining provisions shall remain in full force and effect.

3. Interpretation. For all terms used in this Free Speech Policy, the masculine gender shall include the feminine, and the singular shall include the plural, where indicated by context.

⁹ Objects that accompany First Amendment activities are not themselves protected by the First Amendment. *See Port of Portland, Or.*, 2005 WL 1109698, at *15; *see also Grutzmacher v. County of Clark*, 33 F. Supp. 2d 896 (D. Nev. 1999) (upholding the proprietor's restriction on placing any "table, chair, mechanical device, or other structure" at the airport).

¹⁰ See previous note.

APPENDIX A

Application to Conduct First Amendment Activities

Each applicant to conduct First Amendment Activities at the Airport must submit a written application with the following information:

1. The name and address of the applicant and the applicant's legal status (i.e., a natural person, partnership, corporation, association, or other organization);
2. The date(s) of the proposed activity and time(s) of day the proposed activity will occur;
3. The names, address, mobile telephone numbers, and email addresses of an individual(s) who will act as the applicant's responsible agent, and will be present in or on the Airport during the proposed activity;
4. A statement as to whether the applicant (including all partners, officers, directors or trustees thereof) or its agents have had a prior permit revoked for violation of the Free Speech Policy.
5. The nature, purpose, and subject matter of the proposed activity;
6. Each location at which the activity is proposed to be conducted, which must be Expressive Activity Area(s) as defined in the Free Speech Policy; and
7. The number of participants in the proposed activity.