

U.S. Department of Homeland Security
Washington, DC 20229



U.S. Customs and
Border Protection

JUL 23 2004

(bo)
Associate General Counsel
American Airlines
P.O. Box 619616
Dallas / Fort Worth Airport, TX 75261

Dear (bo)

Thank you for your letter of June 14, 2004. U.S. Customs and Border Protection (CBP) shares the concerns of American Airlines regarding the privacy issues surrounding the collection and disclosure of Passenger Name Records (PNR). Your letter was referred to this office by the Chief Counsel, Alfonso Robles, to whom you directed your correspondence, as your issues primarily pertain to operational matters.

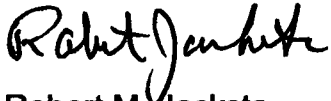
CBP employees with access to airline reservations and flight management systems are not permitted to view PNR data unless the traveler's itinerary includes a reservation on an international flight originating or arriving in the United States. All queries in CBP systems are tracked and routinely audited. CBP personnel are not permitted on a routine basis to access American Airlines PNR data outside of CBP's mainframe computer access (i.e., the Reservation Monitoring System).

CBP recognizes that PNR data is considered to be valuable, confidential information by both the subject passenger and the airline. CBP policy places a high premium on the privacy and integrity of this data, enforcing strict guidelines on its use and disclosure, in addition to complying with all relevant legal requirements governing the treatment of such data. CBP employees found in violation of this policy are subject to penalties that may include fines, dismissal, and imprisonment.

You inquired about CBP personnel accessing the PNR of a passenger who appears to only be traveling domestically. In carrying out CBP's border security mission, we will only access PNR data regarding a domestic flight if a traveler's itinerary within a Sabre reservation also includes an international flight segment (originating or arriving in the United States). For example, a passenger's PNR could reflect domestic travel from Dallas to Miami on American Airlines, followed by a second segment on the same flight itinerary showing a flight to Bogota on a Colombian carrier. While to American Airlines this is classified as a purely domestic flight, to CBP this traveler has an international nexus due to the flight segment to Colombia, and as such our agents are legally authorized to monitor this information.

CBP sincerely appreciates the cooperation we receive from American Airlines, and we look forward to continuing this relationship. If you have any further questions, please feel free to contact me at (b2)

Sincerely,



Robert M. Jacksta
Executive Director
Border Security and Facilitation

American Airlines®

(b6)
Associate General Counsel - Litigation

Telephone: [b6]
Fax: [b6]
MD 5675

June 14, 2004

Alfonso Robles, Chief Counsel
U. S. Customs and Border Protection
1300 Pennsylvania Avenue, NW
Washington, D.C. 20229

Dear Mr. Robles:

In light of recent changes at your agency, and heightened concern about data privacy in the United States, I want to clarify one aspect of the cooperative relationship we have with Customs and Border Protection Services ("CBP").

American Airlines complies with the requirements of CBP to provide information on arriving and departing passengers for international flights. We currently do this by giving CBP access to our Sabre reservation and flight management systems to extract this information for international passengers. Access is given through CBP mainframe computers in order to facilitate CBP oversight of its agent use.

Because of the method in which CBP has access to our systems, I understand that it is possible for CBP to also access information on passengers whose travel itinerary is wholly within the United States. We are not required to give this information to CBP nor, as I understand it, is there any mandate that you monitor passengers on these flights, even if passengers on domestic flights may be persons not legally entitled to be in the United States.

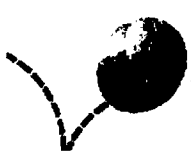
Of course, upon a receipt of a subpoena or other legally enforceable request for this information, we would provide it to CBP. However, in the absence of any legal requirement to give CBP access to this information, I wanted to clarify our understanding that CBP agents access only that information contained in our systems about passengers on international flights. It is our understanding that domestic passenger travel information is not accessed, except perhaps by a sister agency, the Transportation Security Administration, in the event of a security threat to aviation.

We trust the CBP has put in place appropriate privacy policies and procedures to prevent unauthorized access to data in American Airlines' system for which there is no legal authority for CBP access.

We feel the need to clarify this with you in light of certain requests that we have been receiving at our stations from CBP agents seeking to identify persons on domestic flights who may not be entitled to be in the United States but who do not pose a threat to aviation security. While we applaud the efforts of your agency to detect and apprehend persons not legally in the United States, we cannot participate in these efforts without a clear legal mandate to do so. I appreciate your consideration of our concerns and I look forward to hearing from you.

Very truly yours,

[bo]



(b6)

{ b2, b6 } (b6, b2, b7C)
[b6, b7C]

Subject: Threshold Numbers Through 8/31/04 by POE.

Hello All,

[b2, b7E]

Not a very good percentage for secondary inspection results.

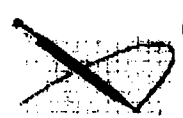
[b2 high
b5
b7E]

My two cents for next week's conference.

Thanks,

(b6)

----- Forwarded by (b6) -----



(b6, b7C)
09/18/2004 03:20 PM

To: (b6)
cc:

Subject: Threshold Numbers Through 8/31/04 by POE.

(b2 high, b7E)

----- Forwarded by (b2, b6, b7C) -----

[b2, b6, b7C] (b2, b6)

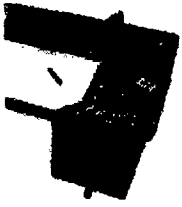
[b2, b6, b7C]

Date: 09/01/2004 09:53AM

Subject: Threshold Numbers Through 8/31/04 by POE.

Please see attached spread sheet for a break down by port of entry of all instances of a rule that fired. This report does not include (b2 high, b7E) or any rule that would not generate a lookout.

Thanks (b6, b7C)



(b2, b6)
 (b2, b6)
 (b2, b6, b7C)
 (b2, b6, b7C)
 (b2, b6, b7C)
 Subject: (b2, b6, b7C, b7E)

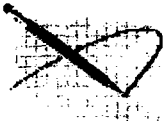
(b6, b7C)

We need to look at this. This may require NTS to supply some TDY help for this. Having people come in TDY will also help them understand our matching.

(b6)
 Office of Field Operations
 National Targeting and Security
 (b2)

Please note new telephone number.

(b6)



(b6, b7C)

(b6, b7C)
 (b6)
 (b6, b7C)
 Subject: (b2, b6, b7C, b7E)

It depends on the match level that is user adjustable.

[b2 high
 b6
 b7C
 b7E]

portion of ATS/P.

), we need to discuss the setting and test before making a major change in this

[b2 high, b7E]

Thanks,

(b6, b7C)

(b6, b7C) wrote: -----

(b2, b6
(b6, b7C))

(b6, b2
Subject: Re: timeline

(b2 high, b7E)

(b6, b7C)
Office of Field Operations
National Targeting and Security
(b2,)

Please note new telephone number.

(b6)

[b6]

09/28/04 12:10 AM

((b6, b7C) (b6)
b6

cc:
Subject: timeline

ATS/P did find this guy. I am breathing easier.

-----Forwarded by (b6)

) on 09/28/2004 12:10AM -----

To: (b6)
From: (b6, b7C)
Date: 09/24/2004 03:00PM
Subject: timeline

(b6,)

(b6, b7C) sent me this timeline that they composed at the NTC for (b2, b6, b7C, b7E) said that the entry:

(b2 high, b6, b7C, b7E)

indicates to him that the PAU made this determination based upon ATS/P Start page alerts.

(b6, b7C)

----- Forwarded by (b6, b7C) on 09/24/2004 02:55 PM -----

[IMAGE]

[IMAGE]

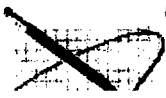
[IMAGE]

[b6, b7C]

To: [b2, b6, b7C]
cc:
Subject: timeline

09/24/2004 01:57
PM

[b2, b6, b7C, b7E]



(b6, b7C)

09/16/04 04:43 PM

To: NTC PERMANENT, NTC WATCH COMMANDERS, NTC TDY
cc: (b6, b7C) (b6)
Subject: Malaysia Flights

To All:

[

b6

b7E

]

Please see attached word document:

(b6, b7C)

Watch Commander

National Targeting Center

[-- b2 -]



(b2, b7E)

National Targeting Center
September 16, 2004

[b2 high, b7E]

ISSUE: Increased scrutiny in response to information received concerning threats arriving in the U.S. from (b2 high, b7E)

BACKGROUND: (

[b2 high, b7E]

ACTIONS:

[b2 high
b7E]

CONTACT: NTC Watch Commander
(b2)

(b6)
10/15/04 11:04 AM

To: (b6, b7C)
cc: (b6)
Subject: (b2 high, b7E)

I just reread your message, and I may have misspoken earlier. (b2 high, b7E)
(b2 high, b7E)

I still think the original idea of looking at these records (b2 high, b7E) is a separate data run from the (b2 high, b7E) project and we can take it as a next step.

I will have (b6) look into this and we will get back to you.

[b6]

(b6)
10/15/2004 06:48 AM

(b2, b6)
cc:
Subject: (b2 high, b7E)

(b6) one of my issues is that to help (b6, b7C) out, we started using the (b2, b7E) for many of our records a while back. My
[b2 high, b7E]

(b6)
Director, Office of Intelligence
U.S. Customs and Border Protection
(b2)

----- Forwarded by (b6) on 10/15/2004 06:48 AM -----

(b6, b7C)
10/15/2004 06:48 AM

To: (b6, b7C)
cc:
Subject:

(b6, b7C): here is my issue:

(b2, b7E) The Commissioner has been very clear to me on this on several occasions. I have always interpreted my role under HSPD 6 to be as follows:

(b2, b7E)

I own the right to protect the interests of CBP. (b2, b7E)
[b2, b7E] all qualify to me. We are then monitoring to see if (b2, b7E)

Do you concur that this is still the policy that we operate under?

(b6)
Director, Office of Intelligence
U.S. Customs and Border Protection
(b2)

----- Forwarded by (b6) on 10/15/2004 06:43 AM -----

(b6)
10/14/2004 05:33 PM

To: (b2, b6, b7C)
cc: (b6, b7C) (b2, b6, b7C) (b6, b7C)
(b6, b7C) (b2, b6, b7C) (b2, b6)
(b2, b6) (b2, b6, b7C)
Subject: (b2, b6, b7C)
(b2, b6, b7C)

(b6)

Thanks for the advice before (b2, b6, b7C)
(b2, b6, b7C) Once this run is complete, each office responsible for the original record
(CBP, ICE, etc) will look at the record and decide what should be done with it. (b2, b6, b7C)
(b2, b6, b7C) We are hoping that the data run (see specs
spelled out below) will help us get a handle on what these records actually are.

The ultimate goal is to fully comply (b2, b6, b7C)
(b2, b6, b7C) (b2, b6, b7C, b5)

The request is to provide the following data -

[

b2
b7E

]

You should also note that I excluded (b2, b6, b7C) from this request. This was done on purpose and not in error.
The reasoning is that (b2, b6, b7C)

Thanks again for the support. I believe that this request should do what we need. The plan is to use the data sort and to provide CBP

(^{b2, b7E, b5}) . I know that you have many requests, so I will leave the timing of the delivery to you, early next week is fine, if possible. I also leave it up to your discretion to add or adjust this request as needed. (b6) and myself will be the main contacts for any inquiries.

Thanks again.

(b6)

Copy to all BSF Divisions

U.S. Department of Homeland Security
Washington, DC 20229



U.S. Customs and
Border Protection

Commissioner

cc: ~~AE~~
~~DAE~~
~~XDS~~
jadr

August 2, 2004

MEMORANDUM FOR SECRETARY RIDGE

FROM: Commissioner *Marc C. Bowyer*

SUBJECT: U.S. Customs and Border Protection Actions for the Period of Increased Risk

I am writing to apprise you of several important steps being taken by U.S. Customs and Border Protection (CBP) to increase our border and homeland security during the continuing period of increased risk. As you know, CBP has implemented 18 critical action items as part of the Interagency Security Plan. Based on the continuing and serious threat leading up to the presidential election, however, I have directed that CBP undertake additional protective measures to intensify security at our borders. I would like to provide you a brief summary of these measures.

As you stated in your remarks earlier this month, we have reason to believe that Al Qaeda is moving forward with plans to carry out a large-scale attack in the United States in order to disrupt our democratic processes. As the border security agency of the Department of Homeland Security, perhaps no agency of our government has a greater responsibility or capability to prevent such an attack than CBP—by preventing potential terrorists and terrorist weapons from entering the country in the first place. We are taking a number of targeted actions, based on current intelligence, to increase the likelihood that we can accomplish this priority mission.

b2 ↑
b7E

We have been doing this almost daily since the Department of Homeland Security stood up. CBP is also working closely with the Department and the air carrier industry to develop a program and rulemaking for receiving air passenger manifest information through our Advanced Passenger Information System (APIS) prior to departure. This would allow CBP to keep potential high-risk passengers off of aircraft bound for the United States using our existing systems and authorities, thereby reducing the threat of terrorist attack to international commercial aviation. With regard to inbound international cargo, I have directed increased cargo examinations at our sea, air, and land border ports through intensified targeting and risk assessment. CBP is also supporting the National Security Special Events by providing non-intrusive inspection equipment and personnel to increase the security of event sites and approaches.

[b2↑, b7E]

Further, we have coordinated with our partners at the Canadian Border Services Agency (CBSA) to conduct increased outbound security inspections ([b2↑, b7E]

[b2↑, b7E]
the international front, I am sending a letter to all of the Directors General of our CSI partner nations customs administrations to request heightened screening and examination of cargo shipments before they are loaded on ships destined for the United States. CSI is now at 20 of the largest foreign seaports, and will be operating at 25 before the end of August 2004.

Lastly, we are communicating aggressively with our field elements through intelligence briefings, conference calls, and alerts to ensure that the appropriate focus and sense of urgency is maintained by CBP's front-line officers at the ports of entry and between them. If we are to prevent and disrupt the terrorists' plans, our border security will be a critical focus area as it is likely that many terrorist operatives are not yet in the country. We will continue to be vigilant and responsive to the latest intelligence.

~~Please contact me if you have any questions or direction, or if you would like to discuss these efforts further.~~

cc: Asa Hutchinson
Under Secretary
Border and Transportation Security

(b6)
10/15/2004 10:07 AM

To: (b2, b6)
cc: (b2, b6)
Subject: [b2, b7E]

(b6)

Can you provide clarification on the questions and confirmation on the assumptions from the programmer below?.

----- Forwarded by (b6) on 10/15/2004 09:58 AM -----

(b6)
10/15/2004 08:14 AM

To: (b2, b6)
cc:
Subject: (b2, b7E)

(b6)

1. This request states (b2, b7E)
(b2, b7E) I'll base my initial extract on this and filter from there. If you think this is incorrect or you believe they are other checks that need to be made please let me know.
2. What are (b2, b7E)? I'm not familiar with this phrase/term.
3. : Can you clarify the following (b2, b7E)
(b2, b7E) The caveat is that we are looking for name records; in other words, if all the T89 records are hitting on (b2, b7E) then you do not need to include them in this data request." I'm not sure what type of venting of the data they are looking for here. How would I/we know if all of the T89 or T92 or VRVK records are only hitting on (b2, b7E)
4. Are there additional exclusions I should also use, such as access level 4 records and/or "CIA" records?

I'm sure as I start to get into this some additional questions will arise, if/when they do I'll let you know. But right now I'll consider this a top priority and keep apprised of my progress and/or problems.

[b6]

(b6)
10/15/04 07:02 AM

To: LL (b2, b6)
cc:
Subject: I (b2, b7E)

(b6)

please look at this request and let me know how quickly we can comply.

Thanks

(b6)

(b2, b6)
01/10/05 07:41 AM

To: [b2, b6] (b2, b6, b7C)
cc:
Subject: Project request.

(b6)

NTC has been tasked by the AC (b2, b7E) In order to accomplish the tasking, NTC will need a weekly extract utilizing APIS data that appears on the ATS-p startpage, please see message below for details. Let me know if it is possible.

Thanks, (b6)
--- Forwarded by (b2, b6) on 01/10/2005 07:37 AM ----

(b6, b7C) To: (b2, b6)
01/09/2005 03:53 PM cc:
Subject: Project request.

(b6) based on the request from (b6) we will probably need OIT help.

(b6) has asked that we create a report based on (b2, b7E) of the Start Page in ATS-P (this request ultimately originates out of OFD). He is asking we collect and analyze data on a monthly basis. We are being asked to determine number of positive and false results. We are also being asked to determine the number of the matches that were confirmed on primary.

I initially tried to collect the information using an ad hoc query, (b2, b7E) (b2, b7E) Therefore if OIT could perform either a daily extract, weekly or monthly extract this would help the project. The extract would be the same data that is displayed on the start screen. We would need APIS data. (

[b2, b7E]

I will be available after the 13 of January for any questions or help I can provide to either OIT or yourself in this matter.

(b6, b7C)
National Targeting Center

[b2]

[b2, b6, b7C]

To: . (b6)
cc:
Subject: DOMESTIC APIS INFO

08/07/2005 10:58 AM

Hi all,

This is the scenario we were talking about. This isn't an actual lookout but just an example.

5 - Select this (b2^m, b7E) from here on previous PNR next

[
b2
b6
b7C
b7E
]

This pax is coming from Atlanta via DL. There is a function that we use to retrieve APIS data from domestic flights that have an international leg. Let me know if you need anything further from us.
(b6, b7C)

Attachment "B"



**U.S. Customs and
Border Protection**

ATS-P Threshold Targeting Query Introduction

July 2004

Law Enforcement Sensitive

(b)(2)/(b)(7)(E)

(b)(2)(b)(c)(d)(e)(f)(g)(h)(i)(j)(k)(l)(m)(n)(o)(p)(q)(r)(s)(t)(u)(v)(w)(x)(y)(z)

(b)(2)/(b)(7)(E)

(b)(2)(b)(8)(b)(7)(C)(b)(7)(E)

' 21

(b)(2)/(b)(6)/(b)(7)(C)/(b)(7)(E)

(b)(7)(D)(b)(7)(C)(b)(7)(E)

(b)(2)(b)(6)(b)(7)(C)(b)(7)(E)

(b)(2)/(b)(6)/(b)(7)(C)/(b)(7)(E)

(b)(2)/(b)(6)/(b)(7)(C)/(b)(7)(E)

(b)(2)/(b)(6)/(b)(7)(C)/(b)(7)(E)

Information to be given to CTR Supervisor

(b)(2)/(b)(6)/(b)(7)(C)/(b)(7)(E)

~~Law Enforcement Sensitive~~

Initial ATS-P Threshold Rules

- Rule 1

[

b2 (high) & b7E (LE)

]

- Rule 2

[

b2 (high) & b7E (LE)

]



Initial ATS-P Threshold Rules

- Rule 3

[

b2 (high) & b7E (LE)

]

- Rule 4

[

b2 (high) & b7E (LE)

]



Initial ATS-P Threshold Rules

- Rule 5



b2 (high) & b7E (LE)



- Rule 6



b2 (high) & b7E (LE)



Initial ATS-P Threshold Rules

- Rule 7



b2 (high) & b7E (LE)



- Rule 8



b2 (high) & b7E (LE)



National Targeting Center
February 18, 2005

ISSUE: On January 10, 2005, the United Kingdom's Joint Border Operations Center (JBOC) began operations.

SYNOPSIS: The United Kingdom's JBOC, which is located in London, England,

b2 (high) & b7E (LE)

RECOMMENDATIONS: [

b2 (high) & b7E (LE)

CONTACT: NTC Watch Commander
(b2 (low) & b6)



Table of Contents

- Objectives
- Benefits
- Current ATS Access Process
- Future ATS Access Process
- Security Constraints
- User Roles
- Business Rules
- Next Steps



Objectives

[

b2 & b7E

]

[

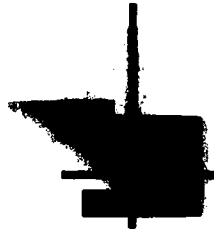
b2 & b7E

]

[

b2 & b7E

]



Benefits

- Accelerated access request and granting processes
- Less email traffic to PMs
- Audit and Reporting capabilities

Current ATS Access Process

b2 (high) & b7E (LE)

Current ATS Access Process

b2(high) & b7E(LLE)

Future ATS Access Process

b2, b7E & b5



Security Constraints

- Need-to-Know
 - Based on user role
 - Confirmed by supervisor
- Authorization

b2 & b7E



Security Constraints (cont.)

- Authorization Route

b2(high) & b7E(L)



User Roles

- Who are your ATS users?
 - Government Agency
 - Organization
 - User Role

Business Rules

- Mapping User Functional Roles to System Permissions

b2 & b7E

b2 & b7E



Next Steps

- User roles and business rules from PMs
- Requirements document certified
- Design and development

July 19, 2004

MEMORANDUM FOR: DIRECTORS, FIELD OPERATIONS

FROM: Executive Director /s/
National Targeting and Security

SUBJECT: Information on Upcoming Passenger Threshold Targeting and
(b2 (high) & b7E (LE))

In response to the heightened period of threat, the Office of Field Operations (OFO), National Targeting and Security (NTS) developed a new module within the Automated Targeting System – Passenger (ATS-P) that will perform automated threshold targeting on all inbound air passengers. NTS developed this new module in coordination with the OFO Border Security and Facilitation (BS&F), the Office of Anti-Terrorism and the Office of Intelligence. [

[b2 (high) & b7E (LE)]

[b2 (high) & b7E (LE)]

Attached are the interim guidelines that will be used for the [b2 (high) & b7E (LE)] process. This new program will be rolled out to the field offices in phases. NTS is currently working with the Office of Information and Technology on the creation of an interface specifically designed for this process. Once this is completed, NTS will issue the permanent guidelines for this program. NTS will advise you of the implementation schedule for the effected airports within your field office. BS&F will be providing the

necessary training during the implementation period and will incorporate this new program into all future CTR training.

If you have any questions regarding this new program, please have your staff call Mr. (b6, b7c) of my staff, at (b210w & b6)

Attachments

ATS Name Matching

November 2004

Scope of Name Matching in ATS

- Match passengers with watch lists
- Match cargo shipment participants with watch lists

b2 & b7E

Three Name Matching Packages

- Cabinet match algorithms [b2 & b7E]
[b2&b7E]
- ATS name matcher
- LAS name matcher

Cabinet Algorithms

b2 & b7E

ATS Name Matcher

b2 & b7E

ATS Name Matcher -- Continued

[b2 & b7E]

Features of ATS Name Matcher

b2 d b7E

Features of ATS Name Matcher -- Continued

b2, b7E

Search Objects

b2 & b7E

Search Key Strategies

[

b2 & b7E

]

[

b2 & b7E

]

LAS Name Matcher



b2 & b7E





Homeland Security

November 8, 2006

(b6)
Director, Homeland Security and Justice Issues
U.S. Government Accountability Office

[b2]

Dear (b6)

Thank you for the opportunity to comment on draft report GAO-07-55, "Aviation Security: Efforts to Strengthen International Passenger Prescreening are Underway, but Planning and Implementation Issues Remain." The Department of Homeland Security (DHS) concurs with the recommendations.

Our specific approaches for addressing the recommendations are reflected below.

Recommendation 1: Complete a strategic plan for the Immigration Advisory Program (IAP) and conduct program evaluations that measure the performance of the pilot IAP sites against predetermined goals and performance measures.

Response: Concur. The IAP Strategic Plan has been drafted by CBP and is waiting final approval. The IAP Strategic Plan outlines the measures CBP intends to use to assess the performance of IAP. CBP is currently developing a method of evaluation that measures the effectiveness of individual locations as well as IAP overall.

The Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA) requires CBP to identify 50 foreign airports to be selected for future IAP deployment. In completing the research for this report CBP has identified several system limitations and data integrity issues that make it difficult to extract and analyze relevant data. In particular current reporting and systems do not reliably capture transit and embarkation points prior to arrival at a US port of entry. As a result submissions have been made for systems enhancements that will permit simple input, extraction and analysis of this information. These systems enhancements will permit CBP to extract the empirical data necessary for baseline and current data. These system enhancements known as Secured Integrated Government Mainframe Access (SIGMA) are currently in production and slated for

introduction to multiple U.S. ports in January 2007. It is anticipated that SIGMA will improve data quality and integrity. It is expected that SIGMA will be phased to additional ports and utilized by all U.S. ports by June 2007. As SIGMA becomes available the system will be used to collect and analyze the relevant data in order to properly evaluate IAP performance.

Recommendation 2: Further align TSA's domestic and CBP's international aviation passenger prescreening processes and coordinate prescreening efforts.

Response: Concur. The Department of Homeland Security (DHS), Screening Coordination Office, has directed CBP and TSA to align the Advance Passenger Information System (APIS) Quick Query (AQQ) process with the Secure Flight (SF) program.

CBP has been working with TSA to align procedures, systems and functional requirements. CBP is working to ensure that the AQQ implementation is aligned with Secure Flight and that AQQ will be implemented as part of an integrated DHS pre-departure screening program for all international air travelers. CBP, TSA and the Center for Disease Control will harmonize data requirements and present a single face to the travel industry.

CBP recognizes that carriers have invested significant resources to reprogram their systems to comply with CBP's current regulations. CBP will continue to work with the carrier industries and leverage their programming to allow for the submission of Secure Flight, APIS and PNR data through one transmission process.

Recommendation 3: Ensure that international aviation passenger prescreening programs are in full compliance with federal privacy laws.

Response: Concur. Presently, the System of Records Notice (SORN) protects data collected from international travelers for the Treasury Enforcement Communications System (TECS) and the Privacy Impact Assessment (PIA) for the Advance Passenger Information System (APIS). CBP has published a system of records notice for the Automated Targeting System (ATS) to remove PNR data and certain screening information from coverage under the TECS SORN and place it under a separate SORN for ATS.

In conjunction with the creation of the ATS SORN, CBP intends to publish a PIA for ATS. Separately, and in conjunction with further enhancements to APIS, CBP is planning to remove APIS information from coverage under the TECS SORN and place it under its own SORN.

Lastly, and in conjunction with the publication of the APIS SORN, CBP intends to publish an update to the APIS PIA to address both the system enhancements to APIS that are being proposed by CBP and to address the creation of the APIS SORN.

While these upcoming actions will enhance CBP's efforts to inform the traveling public about CBP's collection and targeting activities, CBP reiterates that its current notices satisfy the requirements of federal privacy laws.

Sincerely,

[b6]

Director
Departmental GAO/OIG Liaison Office

PNR Success Stories

The Automated Targeting System- Passenger (ATS-P) is an intranet-based computer system used to gather information on persons traveling into and out of the United States for the purpose of identifying high-risk passengers. CBP Officers use ATS-P to target individuals for possible involvement in all types of transnational crime, such as terrorism, narcotics trafficking, fraudulent documents and money laundering. Currently ATS-P retrieves data from a variety of sources including: the Advanced Passenger Information System (APIS), personal search records and secondary examination records, suspect and violator records, non-immigrant I-94 records, Passenger Name Records (PNR), and the National Crime Information Center (NCIC).

One of the main features of ATS-P is the passenger threshold-targeting program. This module of ATS-P identifies high-risk travelers using scenario-based rules that are developed by subject matter experts. (b7E)
(b7E). As new threats are identified, ATS-P is flexible enough that it can be reprogrammed to quickly respond to any event (b7E).

The use of PNR within ATS-P was instrumental in identifying the following individuals, which resulted in adverse and/or enforcement action.

Data Sharing: TSA Coordination

Critical Data Elements: (b7E)

Sep2006- CBP-NTC personnel, while conducting routine ATS-P sweeps of inbound passengers with possible links to terrorism, identified two individuals as possible matches to TSA No-Fly records, terrorist records, and visa revocation records. (]

[b7E] TSA Office of Intelligence, in coordination with the Terrorist Screening Center, determined that both passengers were positive matches to the No-Fly and terrorist records. CBP Officers notified the airline; both passengers were offloaded (b7E) by local law enforcement officials, who returned the travelers (b7E).

Data Sharing: ICE Coordination

Critical Data Elements: (b7E)

Jan2006- CBP Officers used ATS-P to identify a passenger posing a high risk for document fraud. The passenger, posing as a citizen of (b7E), was scheduled to depart (b7E) for the U.S. The subject's travel itinerary was targeted by an ATS-P query formulated using data from recent cases of document fraud out of (b7E) CBP Officers contacted airline representatives in (b7E) and requested assistance in verifying the traveler's documents. With airline assistance, CBP Officers were able to determine

the subject's travel document was a counterfeit (b7E) passport. The subject was in possession of his (b7E) passport. At the time of the offload, the subject was a positive match to the TSA No Fly list as well as being suspected of being an armed and dangerous terrorist. The subject was denied boarding the flight. He was subsequently offloaded on a later date using the same method of ATS-P targeting. In the second incident, he was attempting to travel to the U.S. using a counterfeit (b7E) passport.

Data Sharing: FBI/JTTF Coordination

Critical Data Elements: (b7E)

Apr2007- Three travelers from (b7E) arrived in the U.S. Prior to their arrival, FBI/JTTF provided information to CBP officers that identified these travelers as being linked to terrorism. CBP officers identified the PNR for the three subjects and upon their arrival, referred the travelers for further examination. The three subjects advised that the purpose of their trip was to visit with another individual in the U.S., who is a suspect for money laundering and terrorist financing. After questioning, CBP officers determined that the three subjects were inadmissible to the US. The subjects were allowed to withdraw their application for admission in lieu of Expedited Removal and returned to (b7E)

Data Usage: CBP Secondary Officers

Critical Data Elements: (b7E)

Jun2006- ATS-P identified a high-risk passenger arriving in the U.S. from (b7E) (b7E). The subject applied for admission as a (b7E) citizen under the visa waiver program and was referred to secondary for further examination. The passenger's responses to CBP during the secondary interview raised officer suspicions. Queries in ATS-P indicated the subject purchased the ticket (b7E) Due to inconsistencies in the subject's statements, he was refused admission under the Visa Waiver Program (VWP).

Extended Retention Period

Data Elements: (b7E)

Dec2006- CBP Officers used ATS-P to identify four passengers high-risk for document fraud arriving from (b7E) The booking travel agency had previously been linked to the facilitation of smuggling children to the U.S. with fraudulent documents; (b7E) (b7E) During a secondary inspection it was determined that one of the travelers, an adult non-resident, was attempting to smuggle three minors into the United States (b7E) The subject admitted that all three children were not related to him, (b7E) (b7E) ICE responded and

detained the subject for prosecution. All three children were detained to see an Immigration Judge.

Data Elements: (b7E)

Sep2006- CBP officers used ATS-P to identify a high-risk passenger arriving from (b7E) Based on API and PNR data, CBP identified the subject as the co-traveler of two citizens of (b7E) and TSA No-Fly List hits that had been offloaded in on the previous day.

[b7E]
() He later acknowledged knowing both citizens of (b7E) from his hometown and was found to be in possession of a contact phone number for one of them. Secondary officers determined that he was inadmissible to the US. The subject was permitted to withdraw his application for admission and departed to (b7E)

Data Elements: (b7E)

May2006- CBP Officers used ATS-P to target a high-risk passenger arriving from (b7E) the second traveler was a (b7E) who previously claimed political asylum. (b7E)

[b7E]
() Upon arrival the subject applied for admission as a (b7E) using a B1/B2 visa, and was referred to secondary for further examination. The subject stated that his purpose of travel was to visit a relative. During the secondary inspection, the subject stated that he had been arrested and convicted on terrorist related charges in a third country. The subject admitted to being a former member of an organization which the subject described as similar to Hamas in political views and violent acts that include suicide bombings. JTTF and ICE were contacted and responded to interview the subject. Upon completion of the interview the subject claimed credible fear of returning to (b7E) He later recanted and was expeditiously removed from the U.S.

Data Elements: (b7E)

Jan2006- CBP Officers in Chicago used ATS-P to identify a passenger high-risk for narcotics arriving from (b7E)

[b7E]
() After clearing passport control primary, the subject claimed his baggage and was taken into secondary by CBP Officers. Officers requested a patdown of the subject. Prior to the patdown the subject admitted to having cocaine strapped to

his body. The total weight of cocaine seized from the subject was 3447 grams. Federal prosecution was accepted and the subject was turned over to ICE.

Data Elements: (b7E)

Feb2006- CBP Officers used ATS-P to identify a passenger high-risk for narcotics arriving from (b7E) The subject, a returning U.S. legal permanent resident, (b7E) (b7E) Upon arrival the subject was selected for an enforcement exam. During an examination of the subject's personal effects, CBP Officers discovered two packages containing heroin. The gross weight of heroin was 2811 grams. The subject was placed under arrest and turned over to ICE for prosecution.

Data Elements: (b7E)

Feb2006- CBP Officers used ATS-P to identify a high-risk passenger arriving from (b7E) (b7E) Upon arrival the subject applied for admission as an (b7E) citizen using a B2 visa and was referred to for an enforcement exam. During a secondary examination the subject admitted to ingesting pellets filled with heroin (totaling 1059.9 grams). The subject was also found to be in possession of a counterfeit alien resident card and social security card. Federal prosecution was accepted.

Data Elements: (b7E)

Mar2006- CBP Officers used ATS-P to identify a high-risk passenger arriving from [b7E]) After clearing passport control primary, the subject, a returning U.S. resident, was selected for an enforcement exam. During questioning the subject admitted to swallowing pellets containing heroin. After all pellets were recovered, for a total weight of 1014 grams, the subject was turned over to ICE for prosecution.

Data Elements: (b7E)

Dec2006- CBP Officers at JFK used ATS-P to identify, a high-risk passenger arriving from (b7E) (b7E) Upon arrival the subject was admitted on primary as a

returning USC. During a secondary inspection of his baggage, the subject was found to be in possession of 2385.1 grams of heroin. Federal prosecution was accepted.

Data Elements: ([b7E] b7E)

Oct2006- CBP Officers used ATS-P to identify, a high-risk passenger flying to (b7E) (b7E) The subject was selected for an outbound currency enforcement exam due to high-risk factors identified by CBP Officers using ATS-P. (b7E) (b7E) During an examination of the subject's luggage, \$144,895 was discovered hidden. The currency was seized and the subject was turned over to ICE Agents for prosecution.

Data Elements: ([b7E] b7E)

Mar2007- CBP Officers used PNR information in ATS-P to target a traveler from () as a possible intended immigrant. (

[b7E]) CBP Officers determined that the purpose of his travel to the US was to secure a US passport for his daughter and return to (b7E) with his wife and child. It was determined that the traveler was inadmissible and he was permitted to withdraw his application for admission.

~~SENSITIVE SECURITY INFORMATION / FOR OFFICIAL USE ONLY~~

A Guide to Data Source and Flow

August 2006

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423.1

APIS Manifest Data is Collected in Various Airlines Systems Over Time

This presentation is designed to provide the viewer with a basic understanding of how the data submitted to APIS in a manifest for international flights to/from the U.S. is collected, recorded and organized into a manifest.

To the degree relevant, this presentation provides insight into the varied amount of personal and booking data present at each stage in the process.

It is useful to recognize that each airline's system is customized to some degree to meet their business needs. Additionally system sophistication varies either reflecting business priorities or financial ability of the airline to add system functionality.

Glossary

- **Reservations System** – the inventory system of airline seats through which sales are recorded. Details for each booked passenger are stored in a passenger Name Record (PNR). Flights are generally available for sale not more than 331 days prior to departure. Bookings can be made by various participants in the travel distribution channel including; travel agencies, internet booking sites and direct sales via airline operated reservations call centers.
- **Departure Control System (DCS)** – a system used by airlines to handle functions required for the dispatch of individual flights. Functions provided include passenger check-in (seat assignment, boarding pass issuance and baggage check), aircraft loading plans, flight fueling and aircraft weight & balance). Because the functions are specific to the aircraft type and in some case to the individual aircraft assigned to a flight, DCS for a flight is generally initiated 48 to 24 hours in advance, when aircraft assignments stabilize.
- **Passenger Name Record (PNR)** – The sales record for one or more passengers traveling on the same itinerary. PNRs include details of the sale including who made the reservation, fare quoted, ticketing information, payment details, special request made for passengers, remarks concerning the reservations, baggage checked (in some systems fed from DCS), contact information, and details of changes made to that reservation over the life of the PNR.
- **Manifest** – an official listing of all passengers and/or cargo aboard a flight.
- **APIS Manifest** – a specialized listing of all passengers and crew aboard a flight that conforms with CBP regulations. The manifest is required to be sent not later than 15 minutes following flight departure (wheels up).

Departure Control Systems

Passenger Data Timing and Flow

Reservations
(most hosted by GDS)

Passenger data included in PNR

Up to 331 Days prior to departure

- Name
- Passport or other Travel Document information (for return flight)
- Special Service Requests or SSR (e.g. for meals, handicapped, etc.)
- Itinerary information for down-line tags, etc.
- Frequent Flier number(s)

Feeds minimal Passenger data at flight initiation

DCS

Flights are Initiated at 48 to 24 hours prior to departure

Passengers Check-in

DCS

Flight Closeout At Departure

APIS Manifest (+15 min.)

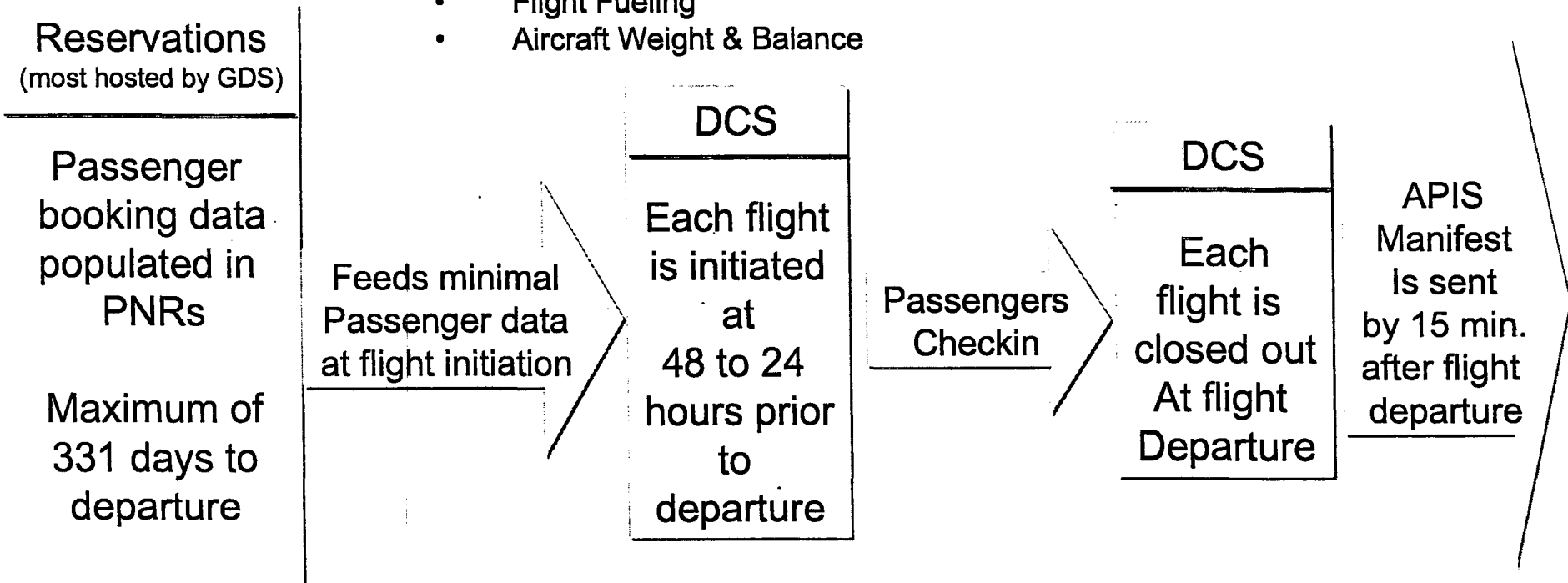
For international flights, passport data for APIS purposes for outbound flights is usually stored in an SSR field in the DCS, and is uploaded to the Reservation System for use in the return flight in or out of the country.

DCS generally retains information for 2 to 3 days after completion of the flight

Departure Control Systems (DCS) - Overview

DCS provides dispatch functions and data for airlines including:

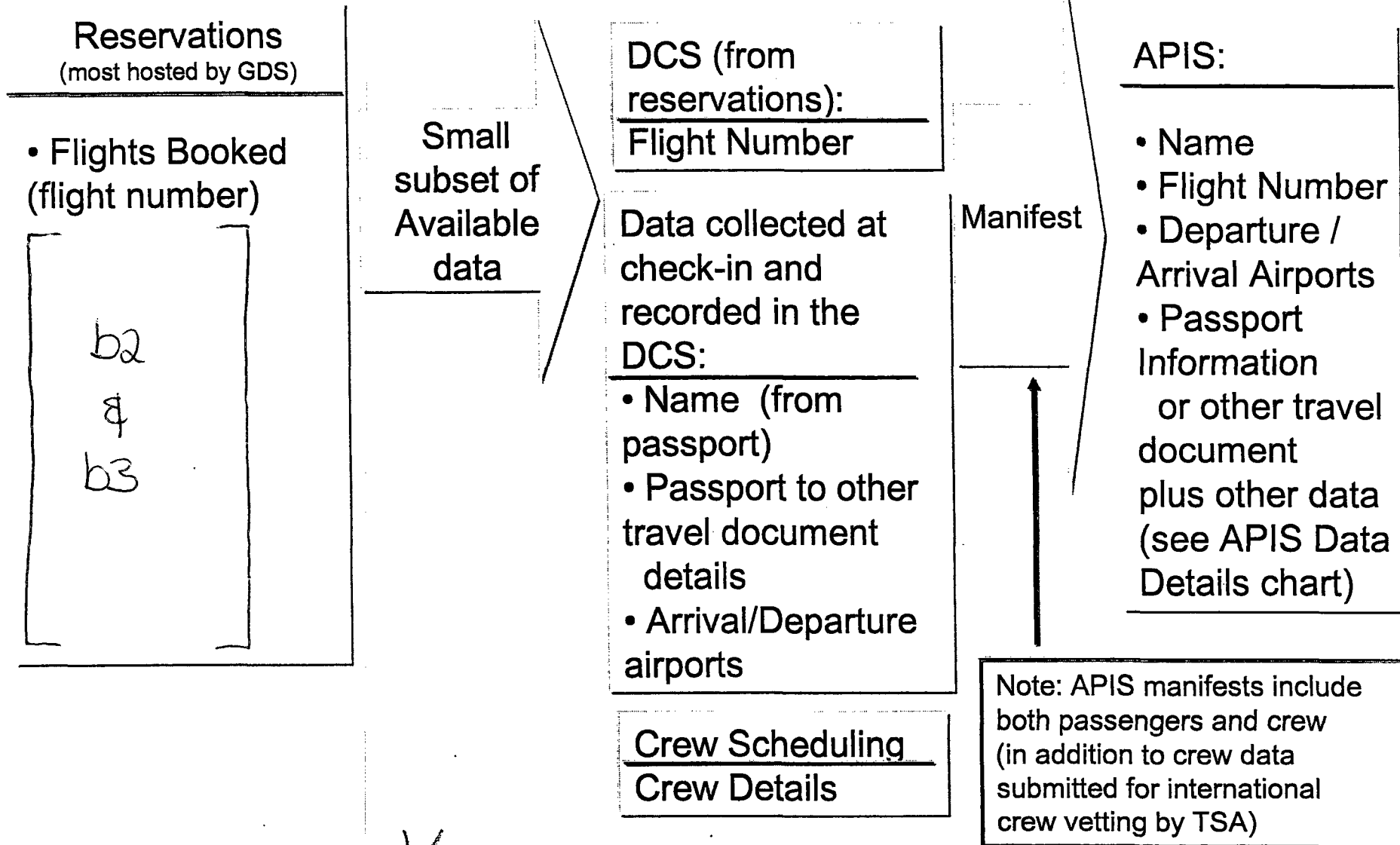
- Passenger check-in records
- Seat Maps for aircraft
- Aircraft loading (baggage, cargo and mail)
- Flight Fueling
- Aircraft Weight & Balance



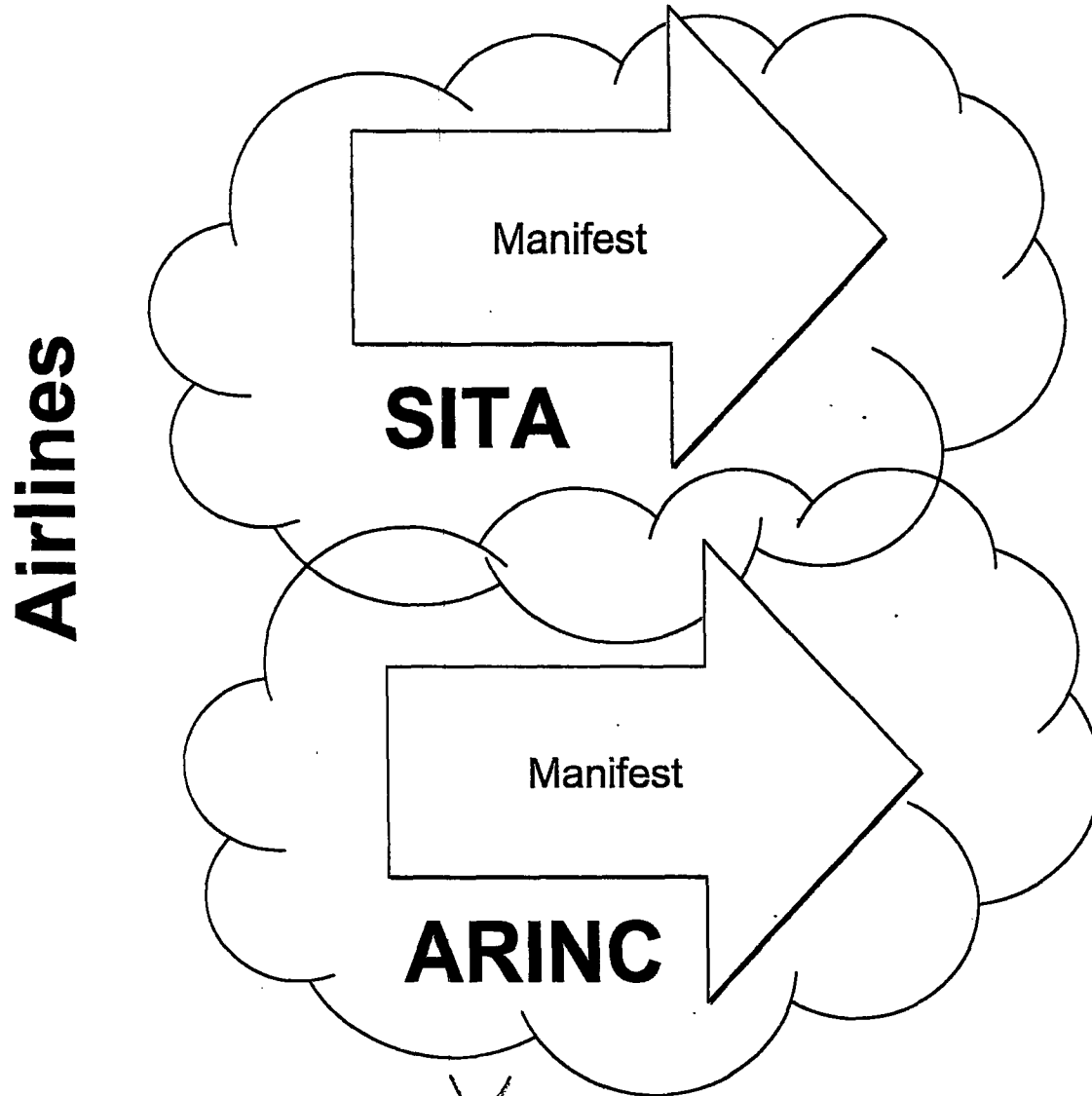
The degree of integration between Reservation and DCS systems vary widely by carrier due to sophistication of systems and level of investment

Travel document information is collected during passenger check-in including passport or travel document details

Airline send a small amount of reservations data on each passenger to APIS



Many Airlines Submit APIS Data to CBP via ARINC or SITA



APIS:

- Name
- Flight Number
- Departure / Arrival Airports
- Passport Information or other travel document plus other data (see APIS Data Details chart)

Both ARINC and SITA provide Airlines with messaging services (carriers pay for message delivery)

Only a small portion of PNR data is passed to DCS and then on to APIS

PNR Data Elements	Reservations	DCS	APIS (today)
1. PNR record locator code			
2. Date of reservation			
3. Date(s) of intended travel			
4. Name			
5. Other names on PNR			
6. Number of travelers on PNR			
7. Seat information			
8. Address			
9. All forms of payment			
10. Billing address			
11. Contact telephone numbers			
12. All travel itinerary for specific PNR			
13. Frequent flyer information (limited to miles flown and address(es))			
14. Travel agency			
15. Travel agent			
16. Code share PNR info			
17. Travel status of passenger			
18. Split/Divided PNR info			
19. Identifiers for free tickets			
20. One-way tickets			
21. Email address			
22. Ticketing field information			
23. ATFQ fields			
24. General remarks			
25. Ticket number			
26. Seat number			
27. Date of ticket issuance			
28. Any collected APIS information (note 1)			
29. No show history			
30. Number of bags			
31. Bag tag numbers			
32. Go show information			
33. Number of bags on each segment			
34. OSI information			
35. SSI information			
36. SSR information			
37. Voluntary/involuntary upgrades			
38. Received from information			
39. All historical changes to the PNR			

b2
\$
b3

Additional APIS Data Elements	DCS	Comments
Full name (last, first, and, if available, middle);	X	
Date of birth	X	
Place of birth (city, state—if applicable, country);	X	
Gender	X	
Citizenship;	X	
Address of permanent residence;	X	
Status on board the aircraft;	X	
Pilot certificate number and country of issuance	X	
Travel document type	X	
Passport number	X	
Passport country of issuance	X	
Passport expiration date,	X	
Alien registration number	X	
Alien Registration Card	X	
Last departure airport code	X	
Port/place of final arrival (foreign port code)	X	

b2
\$
b3

Departure Control Systems

Dispatch functions and data are provided for airline use:

- Passenger check-in records
- Seat Maps for aircraft
- Aircraft loading (baggage, cargo and mail)
- Flight Fueling
- Aircraft Weight & Balance

Only passenger check-in data is included in this analysis

Some carriers have DCS systems closely integrated with reservations, others have very limited integration

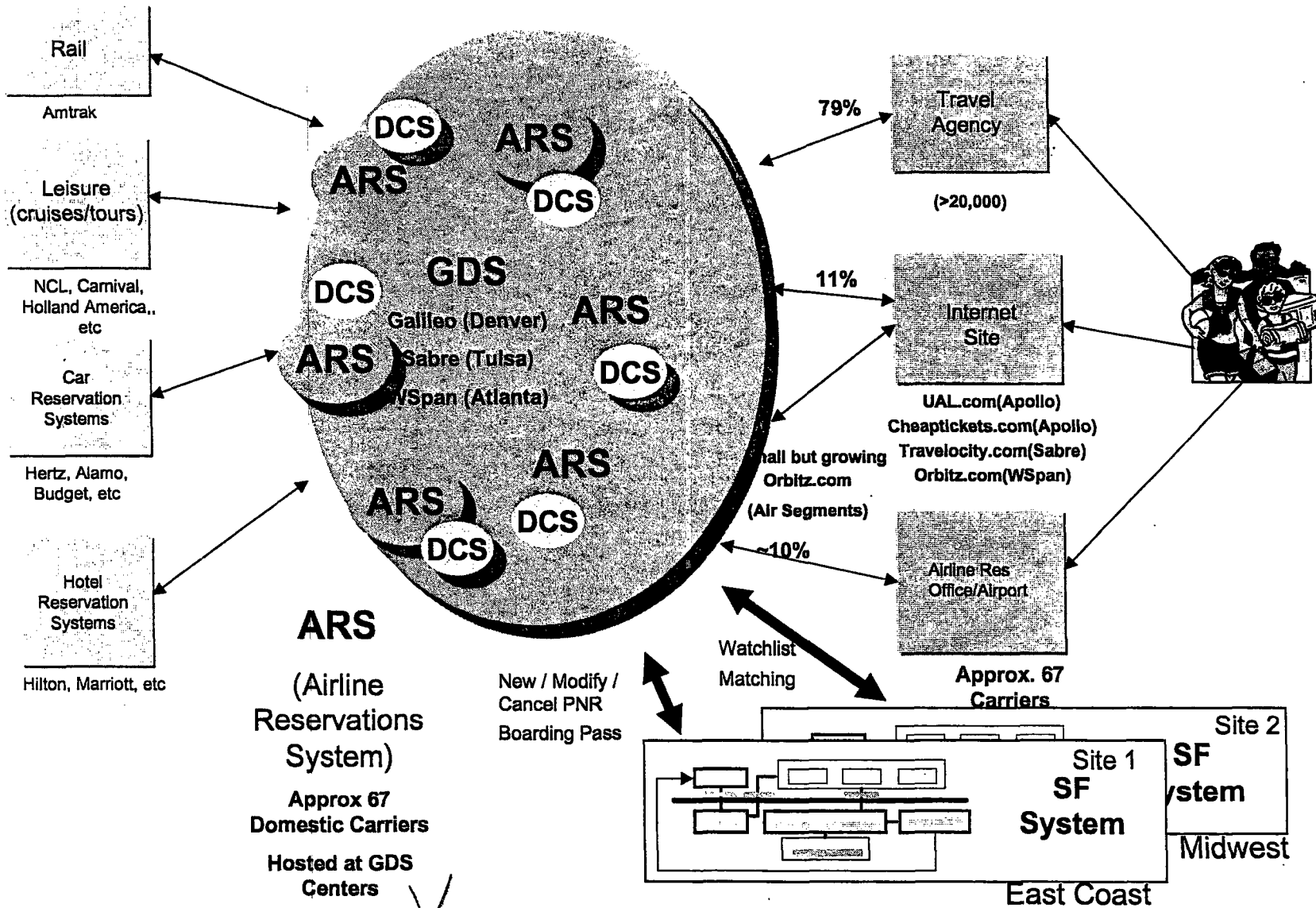
This analysis represents the most universal data shared by virtually all airline systems (lowest common denominator)

APIS Data in Detail

- The current APIS regulation (requiring a manifest by 15 minutes port departure) requires the following data. Additionally data sources and comments are noted below

Current APIS Data	Data Source	Comment
Full name (last, first, and, if available, middle);	<div style="border: 1px solid black; width: 100%; height: 100%; display: flex; align-items: center; justify-content: center;"> b2 d b3 </div>	
Date of birth;		
Place of birth (city, state—if applicable, country);		
Gender (F = female; M = male);		
Citizenship;		
Address of permanent residence;		
Status on board the aircraft;		
Pilot certificate number and country of issuance (if applicable);		
Travel document type (e.g., P = passport; A = alien registration		
Passport number, if a passport is required;		
Passport country of issuance, if a passport is required;		
Passport expiration date, if a passport is required;		
Alien registration number, where applicable;		
Passenger Name Record locator, if available		
International Air Transport Association (IATA) departure port		
IATA code of port/place of final arrival (foreign port code);		
Airline carrier code;		
Flight number;		
Date of aircraft departure.		

Airline Reservations Processes



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GDS Systems / Hosted Airlines Attachment II (Domestic Based)

Host	Company	Enplanements (millions)	Host	Company	Enplanements (millions)	Host	Company	Enplanements (millions)
	<i>EDS Shares</i>	73.8		<i>Sabre</i>	269.0		<i>Multiple GDS</i>	40.0
	Aloha Airlines, Inc.			Air Midwest Airlines			Mesa Airlines, Inc.	
	America West Airlines, Inc			Alaska Airlines Inc			Skywest Airlines, Inc.,	
	Caribbean Sun Airlines, Inc.			American Airlines, Inc.			Chautauqua Airlines Inc	
	Commutair, Inc./Champlain Ent.			American Eagle Airlines, Inc.			Trans States Airlines, Inc.	
	Continental Airlines Inc.			ATA Airlines, Inc.				
	Continental Micronesia, Inc.			CapeAir / Hyannis Air Service, Inc/			<i>No GDS Hosting/Standalone System</i>	4.1
	ExpressJet Airlines, Inc.			Colgan Associates, Inc.			Spirit Airlines Inc	
	Gulfstream Intl Airlines			Executive Air				
	Hawaii (Aloha) Island Air			Frontier Airlines			<i>Manual Reservations</i>	5.4
				Hawaiian Airlines, Inc.			Allegiant Air, LLC	
	<i>Worldspan</i>	162.0		Horizon Air Inc.			Boston and Maine Airways Corporation	
	Atlantic Southeast Airlines Inc			Midwest Airlines Inc			Champion	
	Big Sky Airlines			Piedmont Airlines, Inc.			Falcon Air Express	
	Comair Inc.			PSA Airlines, Inc			Freedom Air	
	Delta Air Lines, Inc.			RegionsAir(dba American Connection)			Great Lakes Aviation Ltd	
	Mesaba Aviation Inc			Shuttle America			Miami Air International	
	Northwest Airlines Inc			Skyway (Astral Aviation Inc)			Omni Air International	
	Pacific Island Aviation			Southwest Airlines Co			Pace Airlines	
	Pacific Wings			Sun Country Airlines Inc. (MN Airlines LLC)			Republic Airlines Inc (Startup)	
	Pinnacle Airlines			US Airways, Inc.			Ryan International Airlines	
							Sky King	
	<i>SITA</i>	0.1		<i>Galileo</i>	61.8		USA 3000 (Brendan Airways LLC)	
	North American Airlines			Air Wisconsin Airline Corp			XTRA Airways	
				GoJet			Mokulele Flight Service (start up)	
	<i>Navitaire Open Skies</i>	31.0		United Air Lines Inc.			Mountain Bird/Salmon Air	
	Air Tran Airways						Scenic Airlines	
	jetBlue Airways Corporation							