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### INTERNEWS NETWORK

P.O. Box 4448  
Arcata, CA 95518 USA  
Tel +1 707 826-2030  
Fax +1 707 826-2136  
info@internews.org  
www.internews.org

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SUBMITTED VIA EMAIL TO: [jdenale@usaid.gov](mailto:jdenale@usaid.gov), [pheneghan@usaid.gov](mailto:pheneghan@usaid.gov),  
and [bjohnson@usaid.gov](mailto:bjohnson@usaid.gov)

Mr. Jeff Denale  
Coordinator for Counterterrorism  
Office of Security  
U.S. Agency for International Development  
Room 2 07-106, RRB  
Washington, D.C. 20523

RE: Notice of Public Information Collection, Federal Register, Vol. 72, No.  
190, October 2, 2007  
Title: Partner Information Form  
Type of Review: NEW Information Collection

Dear Mr. Denale:

The comments provided herein are submitted in response to the announcement published in the *Federal Register* on October 2, 2007, (Vol. 72, No. 190, pp. 56041-56044) proposing to collect information from all individuals and organizations receiving USAID awards for a Partner Vetting System (PVS). Internews respectfully reiterate our concerns about the PVS as expressed in our August 27, 2007, comment letter, about the requested exemptions to the Privacy Act as noted in our September 18, 2007, comment letter, and about the necessity for the collection of information and the accuracy of the burden estimates as outlined in our September 21, 2007, comment letter (comment letters submitted in response to the *Federal Register* notices of July 17, 2007, July 20, 2007, and July 23, 2007, respectively).

In response to the above-referenced announcement, I have signed a letter with other CEOs of several of our sister organizations whose work focuses on democracy and civil society issues. That letter expresses most fully my organization's concerns, which are in addition to our initial letters of 27 August 2007 and 18 September 2007. Briefly, they are as follows:

- USAID has not demonstrated a need for the PVS nor is the collection of information necessary for the proper performance of the Agency;
- The burden estimates provided in the notice are woefully underestimated;
- The exemptions requested to the Privacy Act undermine its basic principles and curtail due process;
- The Partner Information Form and its instructions are confusing and include references to provision of "technical assistance," implying the vetting of and disclosure of personal information on program beneficiaries to USAID;
- The PVS, as currently outlined, lacks sufficient safeguards to protect individuals' personal data;

- All aspects of the Partner Vetting System, including the information collection process mandated by USAID/West Bank & Gaza in Mission Order 21 and referred to verbally by USAID/Washington as the "pilot program," are subject to the Paperwork Reduction Act; and
- The impact of such a system on programs has not been considered and could be an impediment to larger U.S. foreign policy goals.

Please refer to the letter from the democracy NGOs for specific details of our assertions above.

Sincerely,



David Hoffman  
President