



November 27, 2023

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Branch Chief
Economic Impact Analysis Branch
U.S. Customs and Border Protection
Office of Trade, Regulations and Rulings
90 K Street NE, 10th Floor
Washington, DC 20229-1177

**Re: Comments of Airlines for America to CBP's Information Collection Review
(OMB Control No. 1651-0009)**

Airlines for America ("A4A"), on behalf of its members,¹ appreciates the opportunity to comment on U.S. Customs and Border Protection's ("CBP") information collection review, *Agency Information Collection Activities; Revision of Existing Collection; U.S. Customs Declaration (CBP Form 6059B)* (hereinafter "ICR").² In sum, we fully support the elimination of all CBP paper forms—including the Customs Declaration (CBP Form 6059) and as done with the Arrival/Departure Record and Nonimmigrant Visa Waiver Arrival/Departure Record (CBP Forms I-94 and I-94W)—to streamline and expedite the entry process for our members' passengers. In addition to the benefits to the traveling public, airline operators will also realize cost-savings benefits by avoiding administrative processes associated with such paper forms.

With respect to the Automated Passport Control (APC) program, we applaud CBP's termination of the program and for the introduction of biometric Simplified Arrival ("SA"), which directly addressed the industry's interest in expediting the deployment of SA during COVID while air travel from abroad was limited. Although APC was a successful program in reducing passenger wait times, CBP's transition to biometrics has further improved the entry process.

A4A also fully supports CBP's Mobile Passport Control (MPC) and the recently introduced MPC mobile application, allowing eligible travelers to digitally submit their information—i.e., uploading of travel documents, photos and customs declarations

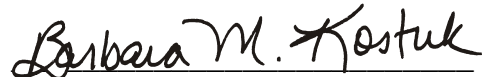
¹ See A4A's members are Alaska Air Group, Inc.; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

² 87 Fed. Reg. 71,210 (Nov. 22, 2022).

through free secure mobile application or other device—further eliminating paper forms, reducing congestion and wait times during the entry process, and overall improving the efficiency of the entry process. Specifically, MPC provides a significantly more efficient and faster in-person inspection process involving the CBP officer and the traveler because administrative tasks are performed by the traveler before the arrival at the passport control inspection station. A4A members continue to pledge their support and efforts to work closely with CBP to promote MPC to travelers.

We thank CBP for considering our comments and look forward to continuing to work with CBP towards fully modernized entry processes.

Respectfully submitted,

A handwritten signature in black ink that reads "Barbara M. Kostuk". The signature is written in a cursive style with a horizontal line underneath the name.

Barbara Kostuk
Managing Director, Passenger Facilitation
AIRLINES FOR AMERICA