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Alaska Airlines' Comments on the Arrival and Departure Record NPRM

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Directed To:
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Overview:

The Arrival and Departure records maintain a legacy paper process for the former Immigration and Naturalization Service. The system was created to assist in the tracking of foreign persons entering/exiting the United States.

CBP already receives all necessary data via APIS.

Our comments will address the following as indicated in the NPRM.

a) Whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.
b) The accuracy of the agency's estimates of the burden of the collection of information.
c) Ways to enhance the quality, utility, and clarity of the information to be collected.
d) Ways to minimize the burden including the use of automated collection techniques or the use of other forms of information technology.
e) Estimates of capital or startup costs and costs of operations, maintenance, and purchase of services to provide information.

Comments for statement "a":
• Alaska Airlines understands the necessity of tracking foreign visitors entering and exiting the United States. However, we do not believe that the collection of such information is efficient when done in a manual method as done today and do not support this process.

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- The paper I-94s have a cost associated of $11.00/pad of 100 according to 8 CFR 299. The potential cost associated based on your estimated number of respondents is over 1.9 million dollars.
- Alaska Airlines currently submits to CBP, for each passenger on each international arrival and departure, Advance Passenger Information System (APIS) data. Therefore the data on the paper I-94 is an unnecessary redundant process.
- The information (on the front) found on the I-94 is completed by the customer, not the airline. The information is not verified to be accurate or true. However, air carrier employees verify the information submitted in APIS.
- In order for the information to beneficial to the agency and have practical use, the agency should use the information provided by the air carriers. Air carriers are held to high standards to ensure accuracy of the data.
- CBP has not identified the purposes of adding new fields for the collection of email and phone number, therefore the public cannot determine if these will be useful.
    a. Many customers still do not have email addresses, and some do not have phone numbers.
    b. One would assume if a person were trying to enter the United States illegally, they would not provide true information. So these additional fields may not provide added benefit.
    c. In addition, CBP has access to all PNRs for airlines. If airlines currently collect this information CBP would also have access via the current push/pull PNR regulations.

Comments for statement "b":
- I would state that the handling time per I-94 is no more than 7 minutes from an air carrier perspective for each customer.
- However, this does not account for the policy, procedure and training requirements that must be accomplished when using the I-94s.
    o This does not include the cost associated with training customers via ads taken out in the inflight magazine. (This is not free to most carriers.)
- In addition, the time taken to order and stock paper supplies and the cost of storage of such supplies on the ground and in the aircraft.

Comments for statement "c":
- As stated previously, the I-94s are handwritten and not subject to verification therefore, errors may result in the completion of the form.
- Air carriers assist customers in completing the form, if the customer asks for assistance. Many carriers use their inflight magazines to assist the customer in completing the form accurately.

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- In order to have an accurate system that tracks the customers, APIS and US-VISIT are two alternatives. APIS is controlled by the US Government and performed by the air carriers. This system provides data verification. US-VISIT is performed by the US Government, which is used as a form of tracking/verification.

Comments for statement "d":
- Alaska Airlines feels strongly that the US Government is receiving accurate information on foreign visitors via APIS.
- In addition, air carriers are working towards APIS Pre-Departure, which will allow carriers to provide CBP with data well in advance of departure.
- Creating a new or other redundant system is foolish at best. The time associated with recreating the wheel is not in the best interest of the US Government or the air travel industry.
  - If any programming is done, it should be within the Government's internal system for the sharing of the appropriate information to the CBP Officers at the appropriate land, air and vessel entry/exit locations.

Comments for statement "d":
- Airlines are already providing the information to CBP; therefore there would be no additional "start-up" costs. Unless CBP required email and phone to be part of the current APIS and/or US VIST requirements, which is not recommended.
- However, by updating forms, there is an added expense if CBP expects all old forms to be destroyed.
  - There is a cost associated with destroyed controlled paper stock.