

Johnson, Joanna

From: TSAPRA
Subject: FW: Comments on EXIS 60-Day ICR Notice

From: Patrick Coyle [<mailto:pjcoyle@chemicalfacilitysecuritynews.com>]
Sent: Friday, January 07, 2011 9:11 AM
To: TSAPRA
Subject: Comments on EXIS 60-Day ICR Notice

Ms Johnson

I read with interest the TSA's 60-day ICR notice on the proposed Exercise Information System (EXIS) that will support the agency's new Intermodal Security Training Exercise Program (I-STEP). I am responding to the request for comments included in the notice.

Personally Identifiable Information

The notice states that one of the types of information to be collected will be 'User Registration Information' that will include: "user's name, professional contact information, agency/company, job title, employer, and employment verification contact information" (76 FR 792). While I am sure that the TSA has no interest or plans to share this information with other users of the EXIS database, I think that it would be appropriate to specifically state that in the information request.

I suspect that there will be a need to collect additional personally identifiable information since the notice claims that the EXIS database will include information "at the sensitive security information level" (76 FR 792). It is not clear that the user registration data described above will provide for an adequate level of information for personnel screening to vet an individual for SSI access. It would be useful for TSA to provide a brief description of the vetting process that it expects to use to allow users access to SSI data.

As I mentioned in my blog today (<http://chemical-facility-security-news.blogspot.com/2011/01/tsa-publishes-60-day-icr-for-new.html>) I think that this new program is a positive step forward for surface transportation security efforts and TSA is to be commended for developing this program. The additional information suggested above will allay an potential concerns that people might have about providing the necessary information for this program.

Thank you in advance for your consideration of these comments.

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