

From: [DHS.PRA](#)
To: [Walsh, Christina](#)
Cc: [DHS.PRA](#)
Subject: FW: Comment Regarding Proposed Information Collection (Information Collection Request) for the Transportation Security Administration
Date: Tuesday, December 5, 2017 1:15:32 PM

Please see the comment that was submitted to OMB.

Thanks.

-Ty

From: FN-OMB-OIRA-Desk Officer for DHS [<mailto:DHSDeskOfficer@omb.eop.gov>]
Sent: Tuesday, December 05, 2017 9:40 AM
To: DHS.PRA
Subject: FW: Comment Regarding Proposed Information Collection (Information Collection Request) for the Transportation Security Administration

From: Daniel J Gandert [<mailto:d-gandert2007@law.northwestern.edu>]
Sent: Friday, December 1, 2017 5:13 PM
To: FN-OMB-OIRA-Desk Officer for DHS <DHSDeskOfficer@omb.eop.gov>
Subject: [EXTERNAL] Comment Regarding Proposed Information Collection (Information Collection Request) for the Transportation Security Administration

Dear Department of Homeland Security Desk Officer,

I am writing to express my comment regarding the TSA's proposed Information Collection Request.

I am currently a member of the TSA's Precheck program and am extremely happy with the current setup of the program. I appreciate the way that the program allows members to go through airport security in an efficient and safe manner and believe that the program has increased the ease of my travels. The verifying membership with a check of IDs and boarding passes works well. The continued implementation of REAL ID requirements makes any additional identity check for Precheck members unnecessary.

I am opposed to the program collecting and storing additional biometric data, especially iris scans. I believe that the current system of verifying government issued identification and boarding passes works fine. I believe that storing and using additional biometric data violates the privacy of members. The movie "Minority Report" does an excellent job of illustrating how troubling that it can be to have a society where iris scans are done to individuals in the name of security and I believe that it is important for the US to stay away from moving in this direction. If any additional biometric information is collected, I would prefer for it to not include iris scans.

I am also concerned about any proposal that would allow data to be shared with other government agencies, private organizations, or private corporations. Companies and

government agencies have been victims of many computer "hackings" and other incidents where customer data is stolen or used by unauthorized users. Because there is no way to change one's biometric data, the possibility of this occurring if data is shared is extremely concerning, since a person whose biometric data is stolen may be subject to issues occurring for the rest of his or her life. Because of this, the TSA should move away from any additional collection or use of biometric data.

I am against the TSA being able to share any biometric data of members with other government agencies without a warrant. Requiring a warrant protects the member's privacy. This helps ensure that the constitutional rights of Precheck members are respected.

I am in favor of the TSA making it easy for precheck members to renew their membership online without requiring any additional biometric data to be submitted and without the member being required to appear at any office or registration facility in person.

Thank you very much.

Daniel Gandert
Clinical Assistant Professor
Northwestern University Pritzker School of Law