

From: [DHS.PRA](#)
To: [Walsh, Christina](#)
Cc: [DHS.PRA](#)
Subject: FW: [EXTERNAL] Federal Register Number: 2017-23770 (OMB Control Number: 1652-0059)
Date: Tuesday, December 5, 2017 1:10:41 PM

Please see comment 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: [EXTERNAL] Federal Register Number: 2017-23770 (OMB Control Number: 1652-0059)

From: Allen Sanderson [<mailto:allen@sci.utah.edu>]
Sent: Saturday, December 2, 2017 12:27 AM
To: FN-OMB-OIRA-Desk Officer for DHS <DHSDeskOfficer@omb.eop.gov>
Subject: [EXTERNAL] Federal Register Number: 2017-23770 (OMB Control Number: 1652-0059)

Collection of biographic and biometric information by individuals seeking to enroll in the TSA Pre✓® Application Program,

1) Evaluate whether the proposed information requirement is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

Unless the TSA Pre✓® Program is going to become the Clear Program there is no need for an applicant to submit additional biometric information.

As such, proposed information requirement is NOT necessary for the proper performance of the functions of the agency, further the information will NOT have practical utility.

(2) Evaluate the accuracy of the agency's estimate of the burden

TSA is already a boated agency that has been and continues the waste tax payers monies without adding any additional safety to the public.

(3) Enhance the quality, utility, and clarity of the information to be collected; and
The collection of additional biometric information will NOT enhance the quality, utility, and clarity of the program. The use additional biometric information such as iris scans are still either used on a limited basis or still a pilot project. As such, there will not any database for comparison.

(4) Minimize the burden of the collection of information on those who are to respond, including using appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

The collection of additional biometric information will in most cases not be an immediate burden.

However, maintaining the security of such information is a burden. Data breaches are a burden for applicants.

Allen Sanderson
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