

House Committee on Homeland Security
Subcommittee on Transportation Security and Infrastructure Protection
Hearing on “Managing Risk and Increasing Efficiency: An Examination of the
Implementation of the Registered Traveler Program”
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Testimony of Steven Brill, Chairman and Chief Executive Officer
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Madame Chairwoman, members of the Committee. I'm delighted to be here today to represent Clear, which now operates the Registered Traveler program, or is about to, in 11 of the 12 RT airports. We currently operate Registered Traveler programs in Orlando, San Jose, Cincinnati, Indianapolis, Newark and John F. Kennedy in New York.

By the Fall, we will be operating programs in San Francisco, LaGuardia (New York), Albany (New York), Little Rock, and Westchester.

And Dulles, Reagan, Denver, Atlanta, and Miami are among the major domestic airports which have announced plans to launch Registered Traveler (RT) this year.

The airlines initially had a wait-and-see attitude. But we now have sponsorship and marketing partnerships with British Airways, Air France, Virgin Atlantic and – our first domestic air carrier – AirTran Airways, with other domestic and international carriers about to join.

Word of the advantages of this common sense program has even spread abroad. We are working with governments, airports, and airlines in Canada, the United Kingdom and Europe to launch Registered Traveler.

The logic of the program and the process is simple: If people volunteer to provide some biographical information about themselves so they can be screened in advance, the availability of cost-efficient biometric technology now enables them to be issued a card that only they can use in order to expedite their process through security. Moreover, the membership fees they pay should also enable their Registered Traveler service provider to deploy enhanced security equipment at the RT lanes which should aid in allowing members an expedited security process. The prime current example is a shoe scanner that we have co-invented and developed with GE that scans shoes so that our members will not have to remove them as they pass through the TSA checkpoint.

But this is both a good news and a bad news story, and we need your help to correct the bad news.

The Good News – More Than 50,000 Members With Millions on the Way, Better Security, Better Equipment, Faster Lanes for All, and 30%-50% of the “Hay” Removed From the Haystack

Our 53,000 members love the program. They appreciate that the technology works and that it takes them a half minute to four minutes to get through any lane at any of our airports. And they appreciate our trailblazing privacy policies, which include independent public privacy audits of our system and what I think is the nation’s first identity theft warranty. More than 90% of those who joined in Orlando – where we started two years ago last week – have renewed their annual 99 dollar subscriptions. In my former life as a magazine editor and publisher, a 90% renewal rate would have been heaven.

At the pace we are now taking enrollments, and with those renewal rates, we could get to four million members domestically within three years, if – and this is the big “if,” as I will explain – the bureaucracy of the Transportation Security Administration (TSA) stops trying, for reasons I can only speculate about, to stunt the program.

Most important, RT improves aviation security. The thousands of road warriors who go through our lanes every day are the only people who have been pre-screened by TSA and whose identities are absolutely assured by their use of biometric cards at our verification kiosks. And our estimate is that once RT is allowed to reach its potential and is rolled out over the next 18 to 24 months, 30-50% of the travelers moving through a big airport on a weekday morning will be pre-screened, biometrically-verified RT members. That’s because RT members travel so frequently that they make up an enormously disproportionate share of the flying population, and it’s because we project 50,000 to 200,000 members at each airport where we launch. That takes a lot of hay out of TSA’s proverbial security haystack – all at zero cost to the taxpayer.

Think about that: a voluntary private sector program that achieves a third to half of one of TSA’s basic missions at no taxpayer cost.

Airports with RT are also more efficient for *all* travelers. In Orlando, we regularly process 10-15% of the passengers moving through the airport using just six percent of the TSA checkpoint lanes. That means that not only does Clear give its members a fast, predictable experience when they arrive at airport security, but it also means that the lines for everyone else are shorter because our lanes process more than their share of travelers.

The analogy here is electronic tolling. As long as the electronic lanes and non-electronic lanes are apportioned correctly, everyone now goes over the Triboro Bridge and the Golden Gate Bridge faster than before electronic tolling was invented.

That’s why every airport that has implemented the program loves it. And our customers love it so much that we’re using quotes from them in a new national advertising campaign.

All of this would seem to be a good deal for TSA, in addition to air travelers and airports. And the deal gets better. As you know, because you have had an opportunity to see it demonstrated, we have financed new technology at the RT lanes that screens shoes for explosives as well as dangerous metal and that even tests for traces of explosive residue on people's fingers, thereby making it possible for them to leave on their outer garments. If TSA allows this innovative technology to be deployed at our lanes, TSA would then get to see the technology working in the best possible testing environment – where travelers have already been vetted – and then decide whether to buy it for all lanes. The private sector will have created the market for the technology and paid the development costs as well. We think that's a good deal for TSA and the country.

The Bad News – TSA's Undermining of the Program

Yet, despite these benefits – voluntary pre-screening and identity verification, free development of technology, faster lanes – TSA has not been treating RT like a good deal. Rather the agency has allowed the program to happen grudgingly, behind schedule, and only then because, frankly, you in the Congress and we as entrepreneurs have pushed it.

TSA Administrator Hawley and Deputy DHS Secretary Michael Jackson – both of whom I have publicly praised for their roles in getting TSA up and running so quickly in 2002 – have supported RT rhetorically, and Secretary Chertoff has made intelligent risk management a key mission of DHS. But, for whatever reason, TSA and DHS have not allowed RT to become what it can and should become. To the contrary, it seems that at almost every turn decisions that threaten to undermine RT have been made by the TSA Threat Assessment and Credentialing Office. That's the office also responsible for TWIC and Secure Flight. Perhaps the folks in charge there don't want to see a private sector program flourish while those government programs remain unfulfilled.

To give you the big picture, TSA now requires that we:

- Write and submit separate System Security Plans totaling 317 pages per airport;
- Prepare and submit separate 305-page self-assessments of how we comply with hundreds of pages of TSA standards and specifications;
- Complete an Independent Pre-Implementation Audit of Compliance from a Big-Four firm with relevant American Institute of Certified Public Accountants standards for each airport that costs over \$200,000 and audits approximately 1,000 control points;
- Adhere to hyper-secure specifications for card encryption and data transmission;

- And adhere to the unprecedented (in any similar federal identity credentialing program, including the credential of DHS employees) requirement of not one but two security-screened attendants to complete each enrollment in order to protect against collusion.

It all adds up to an enrollment, card encryption and security system that is more stringent not only than that used for any airport workers – who typically don’t even have biometric cards – but more stringent than that used for the identity documents issued to members of the Pentagon or Department of Homeland Security.

All of that security makes sense – and we applaud it – as a condition of RT members getting some relief from the standard airport security process. That certainly was Congress’s intent – because that’s smart risk management. But here’s the catch: Our members now enjoy an expedited process only because of the concierges we use at our lanes to help them place their necessary items into the bins and then retrieve them after the screening is completed. That has speeded throughputs by 30%. But, as of today, RT members get nothing in the way of an amended security process in return for the security threat assessment, biometric verification, and thousands of man hours and audit pages and dollars of security hoops that we jump through.

In fact, the opposite is true.

The “Double ID” Rule

Beginning last fall, TSA suddenly required that RT members using the RT line show a picture ID and their RT card right before entering the line. These are the same RT cards that, when put into the RT kiosk, will use the traveler’s fingerprint or iris scan to biometrically match the user to the data embedded in the card. That’s right. RT members are the only travelers who must present TWO forms of identification. When Mr. Hawley testifies, he may give you one or more of the many different explanations for this that he has given us over the past year. I would take the time here to rebut all of them, but the explanations, for what is obviously a mistaken directive that no one now wants to admit was a simple mistake, seem to change every week.

So, let me just address two of TSA’s purported explanations, including their most recent one. In letters last month, Mr. Hawley maintained that a photo ID must be checked to enter the RT line because the configuration of the RT verification kiosk and the TSA security checkpoint at some airports could “result in lack of control over ingress to both screening and the secure area.” TSA completely misses the mark. At every airport that features the RT program, the RT service provider and airport work hand-in-hand with the TSA Federal Security Director (whose approval is required) to satisfy the FSD that security and access control is in no way compromised as a result of the configuration of the RT verification lane. That is the appropriate and, indeed, the only way to ensure “control over ingress.”

By contrast, requiring that an RT member show a photo ID to enter the RT line (where s/he is then immediately biometrically verified) has absolutely nothing to do with controlling

access to the area between the RT verification kiosk and the TSA screening checkpoint. This is simply apples and oranges. Moreover, this ignores the fact that our kiosk issues a receipt with the member's digital photo printed on it, which the TSA personnel can inspect at the entrance to the metal detector. That photo is produced when the member's biometric is presented – which makes it far more secure than some fishing license that non-RT members can present back at the entrance to the lane. This also ignores the fact that Mr. Hawley supposedly empowered local Federal Security Directors to approve all RT operations plans at each airport, and none raised this line of site issue (though they might now, given that the boss has conjured it up). Put simply, this argument is plainly absurd.

And, earlier this year, TSA explained that our members had to present a photo ID in addition to the RT card, because our RT verification kiosks wouldn't work if there were a power outage in the airport. Of course, if there were a power outage in the airport, in all likelihood nobody would be going through the RT line or the TSA security checkpoint, because TSA's magnetometers and x-ray machines wouldn't be working, so there were be no opportunity for our members to show their photo IDs to anyone. In short, it's another TSA explanation that makes no sense.

Pilot projects are supposed to be for research and testing. Our Orlando program, started two years ago, began as a pilot project. During that time, in which 300,000 members passed through our lanes, there was not a single incident in which the fact that our members did not have to present an additional photo ID ever caused a problem. Not one in 300,000.

The result of the implementation of the double ID rule has been predictable and unfortunate. Members have called and written Clear with complaints about the obvious illogic of this new rule, which requires them to present *more* in the way of identification credentials than other travelers. Clear has been at a loss to answer these complaints, because there really is no answer. To some customers, whose emails I read and whose calls I take every day, this makes the program, or TSA, or both a laughingstock. I really have no good answer for them.

In response, TSA has informed Clear that it will consider a solution in which photographs appear on the RT cards. As an initial matter, Clear questions the wisdom of this solution. It is just not smart security. One of the advantages of a biometric card is that security personnel become trained to “trust” a biometric match only. If a photograph is added to the card, it increases the possibility that a person for whom RT privileges have been revoked (based on a new assessment of the person's threat risk, for example) will nonetheless be able to convince security personnel to let them through by blaming the negative results of the biometric comparison on some sort of equipment defect. In any event, TSA has stated that it will not even *consider* the alternative of a photo appearing on the RT card unless *all* members of the industry unanimously agree to make it the standard for all RT cards, thereby giving our competitors – who are lagging behind us – a way to stop our progress while they catch up.

That is an abdication of TSA's regulatory role. TSA did not ask for industry unanimity when it unilaterally imposed the rule that requires two attendants for every enrollment. Why now, except to stiff arm this program? If TSA determines that placing

photographs on RT cards is the proper solution, because it is better security, TSA should be the one to make that decision; and if it does, Clear will abide by it. But Clear's compliance with the rules should not be subject to the unilateral veto power of every other vendor – especially those that have expressed tentative interest by declaring themselves part of the “industry group” yet are not serious enough to commit significant resources to enrolling participants or operating lanes at airports. TSA should dispense with the photo identification requirement for RT participants or promptly announce that a photograph on the RT card will satisfy such a requirement.

None of TSA's explanations for the double ID requirement makes sense to any TSA security official I have ever spoken with outside the Credentialing office. I should add that when I first raised this issue with Mr. Hawley, he, too, said it seemed ridiculous and would look into it. But in a pattern that has now been often repeated, when Mr. Hawley consults his staff about RT, his mind always seems to change.

The Saga of The Shoe Scanner – or How Not To Encourage Private Sector Investment in Better Security

My second specific has to do with the shoe scanner I mentioned earlier.

In February of 2006, TSA invited us and General Electric, with whom we co-invented this enhanced RT security kiosk and which manufactures it, to let TSA test it for use at our lanes – and at the lanes of any of our competitors, to whom GE is also committed to supplying it. In return, RT members would not have to remove shoes once the technology was installed. We were told it would be put on a “fast track.” Then the Transportation Security Lab refused to accept it for testing. That standoff lasted until May 2006, and only ended after Mr. Hawley made multiple requests that the lab test it.

Testing then proceeded there, and then on the ground at our lanes in Orlando. In November 2006, after TSA had extensively tested the equipment, TSA provided what appeared to be exactly the clear path for the implementation of these kinds of industry-funded innovations that is necessary for this type of public-private partnership: Mr. Hawley told Clear that once his Chief Technology Officer (CTO) had briefed the relevant local Federal Security Director (FSD) on the benefits of the shoe scanner, and once the FSD agreed to implement the scanner, it would be implemented at that FSD's airport.

Thus, in December 2006 conference calls with the CTO and the FSDs, the implementation was scheduled for January 2007. And in December 2006, TSA told the Wall Street Journal that the shoe scanner was approved for deployment and that people who went through the scan and passed the test and got a receipt – with their digital photograph on it – would then pass through without removing shoes. In a conference call with our team and local TSA officials in Orlando, the CTO confirmed that the equipment had tested well and was approved.

But three weeks later, on the eve of our national roll out and with no explanation, TSA rescinded this decision, although they allowed the shoe scanner to stay on in Orlando. The

sole explanation we got was that a new CTO wanted to conduct a quick review of the prior testing.

In February of 2007 the RT program director told me in an email that the review and some new testing that had to be done would be finished by February 22 and that deployment would likely follow soon thereafter. It turned out, however, that no re-testing was being done at all, or at least that is what we are now being told.

It's now July and as of today TSA is still not re-testing the equipment. That's 15 months since it was put on the "fast track" by TSA. It would not surprise me if when he testifies today Mr. Hawley announces, finally, that the equipment is being tested again. I guess that's why Congressional oversight is so important. But that will only raise more questions: What is the time line for the tests? What is the standard going to be? We and GE believe, and common sense dictates, that the standard ought to be not whether the shoe scanner can detect any molecule of any potentially dangerous element but whether it provides the same or better protection than that provided by putting a shoe through an X-Ray. Mr. Hawley has said that will be the standard, but I'm skeptical as to what the bureaucrats will do.

Interestingly, last month, TSA finally proposed a Memorandum of Understanding with GE to govern the testing of the new equipment, but then refused to agree to any meaningful terms. By way of example, TSA refused to provide any timeline for its testing and refused even to include a watered-down commitment that, if the new equipment satisfied all of the standards established by TSA, TSA staff would make a non-binding recommendation to the TSA Administrator that he allow the new equipment to be deployed with relevant security benefits.

The loss of public credibility and industry credibility has been incalculable. And incredibly, TSA has now been telling those in Congress or the press who inquire that there were "problems" with the GE equipment, an explanation that contradicts their own announcement to the press last December, contradicts everything GE has been told, completely contradicts the TSA email of February, 2007, and is just plain unfair to GE. How would they know about problems if they have not been testing it?

Things have now reached the point where GE has formally notified us that they are about to cancel this project because neither we nor they can justify the investments in it, and GE, as a large public company, can't keep spending money based on hope the way I can.

I am not comfortable saying all of this about TSA. Quite the contrary. As a journalist writing a column for Newsweek while I was writing my book, and then after my book came out, I was criticized by lots of colleagues for praising the people who launched TSA in the first year – including Mr. Hawley and Deputy Secretary Jackson. But I think I was right: they did do a great job getting TSA up and running and taking over the lanes on time. The question is what has happened since to an agency that, when I was watching it, had no bureaucracy but instead had manically-dedicated "Go-Teams" run by Mr. Hawley. Teams that stood at meetings because the furniture hadn't yet been purchased – and then went out to Staples to purchase it themselves when the paperwork to buy it got bogged down.

In one passage of the book, in describing how dedicated and unbureaucratic the TSA pioneers were, I wrote: “TSA-time was something akin to dog years only more so: in terms of how fast they had to move, a day is like a month and a month is like a year.” Although I still have no doubts about Mr. Hawley’s dedication, I keep thinking of that paragraph when I think about the continuing saga of the GE shoe scanner. And I know that the Go-Teams would have laughed that Double ID requirement right out of their makeshift conference room.

I also know that one of the first things Mr. Hawley does every day is go over current intelligence that provides a fresh reminder that there really are terrorists out there trying every day to kill us, and that some still want to use our aviation system to do so. I do not doubt his sincerity or underestimate the burden that he and all of his colleagues at TSA face. I just happen to believe that Registered Traveler and voluntary credentialing can be a significant part of the solution and that this program is consistent with – indeed the embodiment of – the intelligent risk management that Secretary Chertoff has declared is a core element of DHS’s mission.

The “Selectee” Override – Now You See It, Now You Don’t

My third specific has to do with a key feature of the Orlando pilot program that is no more. During the Orlando pilot, TSA authorized a participant’s RT status to exempt them from automated selection for secondary screening. (Of course, TSA retained the right to select any traveler randomly at any time for secondary screening.) The override was logical because the perpetual and real-time vetting provided for in the TSA-issued RT specifications, and to which registered travelers are subject, screens out the very people for whom this “selectee” status is designed. The automated selection criteria are based on generalizations about passenger risk that do not apply to the subset of travelers who have been pre-screened during the enrollment process. Excluding RT participants from this automatic selectee status allows TSA to focus on a smaller group of potentially risky travelers. TSA has now eliminated this common-sense feature.

TSA has told Clear informally that it has done away with the override because, for example, it limits the ability to designate all passengers on a selected high-risk flight as selectees subject to secondary screening. However, there is a much less blunt instrument which would address this concern while preserving the legitimate time-saving feature of the override. If TSA needed to designate all passengers (including any registered travelers) on a designated high-risk flight as selectees, the Federal Security Director at the originating airport could simply instruct the relevant RT service provider to provide no overrides during the time period that passengers for the designated flight are passing through the RT line; that way, all selectees passing through the RT line (including those on the designated flight) would be subject to secondary screening.

Clear *does not* propose eliminating random selection of RT participants for secondary screening. I agree that all security regimes must have an element of randomness. TSA should continue to subject RT members to occasional random secondary screening, while allowing any selectee status governed by certain imprecise data-related factors to be overridden more

often than not at the discretion of the Federal Security Director through the use of an RT stamp – as was done in Orlando. Again, the issue is whether RT is truly going to become a risk management tool.

Help for Secure Flight, US-VISIT Rebuffed

Yes, we are a private company that will profit from our success. We don't apologize for that any more than we seek sympathy for the risks we take in investing in a new industry and in trying to persuade customers to join, one by one. But our success offers more than the usual side benefits for our country. Unfortunately, TSA has stiff-armed those side benefits, too, again perhaps because it is a private sector program.

True, some of these offers would require adjustments to current program processes, but rather than welcome them or at least welcome the chance to explore them, TSA just says no.

We have, for example, offered to solve the predicament of people who are wrongly on selectee or no-fly lists – by giving them RT cards for free. RT solves this problem because, in order to enroll in RT, so-called “false positive” travelers (like all applicants) must present proof of the distinguishing characteristics that separate them from their No Fly namesakes, as well as biometrics that confirm their RT identities. Thus, the individual who does not belong on the No Fly list would get an RT card while the one who belongs on the list would not.

As a public service, Clear has offered to enroll *at no cost* all adjudicated false positives who are referred (at their request) to Clear; thus, they would not have to pay for their bad luck. TSA could then allow these registered travelers to proceed directly through the RT lane (at participating airports), where they would have to present their biometrically-based RT cards for verification. TSA would know that these registered travelers had already been cleared by TSA. As a result, false positive travelers who enroll in RT – again, at no cost – would be able to avoid the perpetual and terribly time-consuming process of establishing their innocence every time they fly. (As the RT program expands to more and more airports, the false positive travelers would get greater and greater benefit from this feature.)

TSA has ignored this offer, even though it would eliminate – at all participating airports – what I know is one of the most frustrating case work issues your offices deal with every day, as you try to help constituents who have the bad luck of having the wrong name.

We are already offering free cards to members of the military, and we are offering a discount of one free month to any government employee. But we've offered a much larger discount if TSA will recognize the screening that so many government workers have already gone through.

For example, we've asked that the threat assessments conducted by the FBI and Secret Service of their own agents be recognized by TSA, so that those agents can get cards for far less money. Even DHS headquarters employees have inquired if they can get a card at a reduced cost because they have already been screened – by DHS. Months ago, TSA gave the

quintessential bureaucratic response to the question of whether the RT program will recognize the screening that many governmental employees have already gone through: “TSA is examining this possibility.” But TSA also said that even if they eventually stop studying it and actually do it, they won’t under any circumstance waive their TSA screening fee of \$28.00. That’s totally baffling.

We have also offered to make our kiosks available for conducting the verification services for US-VISIT, a process that DHS now wants to make the airlines hire people to conduct with additional government-financed kiosks. That offer, too, has been ignored.

Finally, as TSA continues to struggle mightily to roll out Secure Flight, consider that RT can do 30-50 % of Secure Flight’s work – at no cost to TSA.

This is because registered travelers fly so often (an average of 40 times a year, according to the Orlando surveys) that they make up a dramatically disproportionate share of the flying public on any given business day. A registered traveler need not be subject to a Secure Flight search at all, because registered travelers will have been cleared in advance (and on an ongoing basis) through a TSA security threat assessment. Indeed, the RT background check is substantially superior to the likely Secure Flight background check, because only the RT background check will be supported by identity verification – first, at enrollment with a biometric and with scannable forms of tightly-defined forms of identification, and then again with a biometric whenever a registered traveler flies.

By having RT members tell the air carrier when making a reservation that they are RT members, their boarding passes could require that they pass only through an RT lane at the airport – where their identities would be verified biometrically. As a result, based on Clear’s projections that in a full-fledged national program registered travelers will make up 30 to 50 per cent of all travelers moving through an airport on a busy weekday morning, TSA’s daily Secure Flight searching burden could be reduced by as many as 1.25 million of the Secure Flight’s total projected 2.5 million name-matching searches per day. RT’s relief of Secure Flight can begin immediately (and grow) with each expansion of RT to a new location. And, again, those 1.25 million travelers would be going through a more secure process than Secure Flight is expected to offer. TSA has ignored this offer.

An Issue of Common Sense

Almost exactly five years ago this afternoon, President Bush promised in his first White House White Paper on “Securing the Homeland,” that “The Department of Homeland Security will ensure appropriate testing and piloting of new technologies.”

That promise was separated out in a box entitled “National Vision.”

Certainly, enough time has passed for this modest goal to have been met, particularly when the technology to be tested is going to be financed by the private sector and will help secure our homeland. We hired no lobbyists to walk the halls of Congress looking for an

appropriation. Instead, we invested our own private funds in new technology, sent the equipment to TSA for testing, and begged the government to let us deploy it at our expense.

If you sense frustration, you're right.

I got the idea for a voluntary, private sector credentialing industry because as a reporter writing a book about the aftermath of September 11, I read carefully, and was moved by, that White Paper, in which the President called on private companies to become "a key source of new ideas and innovative technologies that will enable us to triumph over the terrorist threat."

My notion was that this new industry should be strictly regulated by the government, and that the government needed to do the screening; but I was also convinced that only the private sector could provide – through a competitive marketplace – the privacy assurances, the customer service, the cost-efficiency, and the technology innovation necessary for this industry to succeed. I still believe that. And that belief is validated by the fact that when TSA launched its own pilot programs in 2004, which they ended in 2005, they spent \$1,500 per card for a program that offered little customer service.

This is not a partisan issue, and it hasn't been one in this Committee. Enhancing security by providing secure biometric identification and pre-screening to 30-50% of the travelers moving through the nation's airports on a weekday morning at zero cost to the taxpayers, while allowing hard-working road warriors to spend an extra half hour at home and then get through the airport security line at 6 or 7 in the morning with less hassle, is not a Republican or Democratic epiphany. It is a matter of simple common sense – and national security, given how much hay it takes out of TSA's security haystack and how much in the way of new time-saving and security-enhancing technology it could provide.

This is why Registered Traveler has enjoyed strong support from both sides of the aisle in this Committee and across Capitol Hill.

Getting to Two Million Members in 2008, Four Million by 2010

Everyone engaged in the creation of the RT program now needs your help to facilitate the testing and approval of new technology in order to provide benefits in the checkpoint screening process – such as being allowed to you're your shoes on, or in the case of our explosive trace device, not having remove your outer garments.

Even if those benefits do not materialize in the short term, we may get to 200,000 members by year end. But with those benefits and the elimination of the double ID requirement, I am confident we will get beyond 500,000 by year end, to two million by the end of next year, and to four million by the end of 2010. We continue to gain members and offer a real service because the benefits we provide help speed the process at the lane. But allowing the deployment of the enhanced security equipment would propel the appeal of RT much further – while also providing, we believe, better security equipment at these lanes.

And, obviously, we need you to help get rid of the double ID requirement, which we believe has already lowered our renewal rate from the mid-90's to 90 percent, as some members vent their well-deserved frustration over a requirement that is so nonsensical that to some it makes us and the entire program a laughingstock.

The Saga of the Twelve Year Old – Two IDs at the RT line; No ID's at the Regular Line

I'll conclude with one more, almost comic, story that illustrates the state of play. Under TSA regulation, children between the ages of 12 and 18 can apply for and get RT cards. Also, as you know, people under 18 do not have to show ANY form of identification at an airport. You probably know where this story is going.

Yes, TSA recently ruled that a 12 year old RT member must not only have his biometric RT card but must also carry his passport or produce some other form of government ID (which he is not likely to have with him, because few 12 year-olds carry one – because they don't drive) in order to get on our line. Yet he can get on any other line and complete the screening process without showing ID of any kind, and if he uses one of those lines there will be no opportunity to confirm his identity using the biometric data embedded in his RT card.

Please ask TSA to explain why that makes sense. Ask why that is good risk management. Please ask TSA to explain why the double ID requirement for any RT member makes any sense. Ask what the purpose is of the security vetting and biometric verification and those thousands of pages of documentation and audits and the millions of dollars worth of encryption technology and enrollment processing that surpasses that used for DHS's own headquarters employee cards. And please ask why TSA still has not re-tested the GE equipment and why TSA has refused even to sign a memorandum of understanding with GE that specifies the timelines for the testing and includes even a mention of the benefits RT participants and the rest of the traveling public might enjoy if the re-tests are successful.

Thank you again for this opportunity to appear before you – and for your support of this important risk management program.