

qrulepubliccomments

From: apisteam@dlh.de
Sent: Wednesday, March 01, 2006 11:49 AM
To: qrulepubliccomments
Cc: adel.baragith@dlh.de; horst.bittlinger@dlh.de; michael.grande@dlh.de; nils.braun@dlh.de; joern.hartwig@dlh.de; gisela.layr@dlh.de
Subject: Lufthansa comments on CDC NPRM
Attachments: Lufthansa comments CDC NPRM.pdf

Dear all,

please find enclosed the comments of Lufthansa German Airlines on the CDC NPRM regarding the collection of passenger contact information.

<<Lufthansa comments CDC NPRM.pdf>>

For further questions please feel free to contact us anytime.

Best regards

Adel Baragith



Lufthansa comments on NPRM for control of communicable diseases

Lufthansa German Airlines
Passenger Security Processes
FRA EB/X

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Lufthansa German Airlines welcomes the opportunity to comment on the Notice of Proposed Rule Making ("NPRM") issued by the Centres for Diseases Control and Prevention ("CDC").

First of all we would like to state that we fully support the position paper of the IATA and the Association of European Airlines ("AEA"). Therefore we need not to repeat our concerns regarding the unfeasible requirement of CDC to capture and store Passenger Contact Information ("PCI") especially regarding all non-machine readable data.

We definitely understand the governments need for collecting certain passenger data to ensure security, health and similar issues. On the other hand we are also sure, that there are better and more efficient ways to achieve the required goals than the current or proposed processes.

Lufthansa would like to use this opportunity to offer a proposal, we believe will definitely achieve the required goals for all three parties involved:

- governments (requiring data)
- passengers (direct source of data)
- airlines (the one who can tell who is in fact flying)

Before we go into details in this regard we would like to stress, that this proposed concept should only be used in case of a real pandemic event and **not** as a precautionary measure for the current situation.

What are the goals of the government?

- receive sufficient data to be able to identify passengers if needed
- timely availability of data to ensure early reaction
- ensuring an acceptable quantity and quality of electronic data

What are the goals of the passenger?

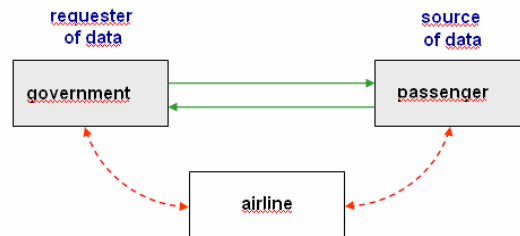
- smooth check-in process
- avoid queuing for data capture at the airport
- ensuring protection of own personal data

What are the goals of an airline?

- safe, economical and on-time operation
- focus on core business: flying
- offering a customer-oriented and competitive product
- support the government to a feasible extent

Although there seem to be contrary interests, all three involved parties are actually seeking for the same goal: "Security and health".

The shortest way between two points is a straight line. Therefore, a direct way of communication in this regard between the passenger and the government “supported by the airlines” can achieve all requirements in an efficient, feasible and high-quality way:



In the following Lufthansa would like to describe its proposal:

ADEL (Advance Data Exchange Locator)

This proposal is simply based on two key elements:

1. Direct passenger data capturing at the source of information and assignment of a unique key for each passenger:
2. Storing the passenger contact information into a database operated by the government department requiring this data.

1. Sources and methods of data capture

To identify the right way of communication, we need to know which is the ideal touch point for the two types of passengers: Foreigners and Nationals.

1.1. Foreigners:

a) Foreigner requiring a Visa to enter the country:

Those passengers have to contact an embassy or a consulate to obtain the Visa. According to the current process an application form has to be filled out. The required information in this form includes all passenger information required by both DHS (APIS) and CDC (Passenger Contact Information).

>>> please see attachment 1 & 2 for the current US-Visa application forms .

As this information is stored in an immigration databank, all the requiring authority needs is an access to this information. This particularly means, by issuing a Visa an ADEL should be assigned to the passenger and printed on the Visa (both on visual and machine-readable zone).

b) Foreigners not requiring a Visa to enter the country (Visa Waiver):

- Andorra
- Australia
- Belgium
- Brunei
- Denmark
- Finland
- France
- Germany
- Iceland
- Ireland
- Italy
- Japan
- Liechtenstein
- Luxemborg
- Monaco
- Netherlands
- New Zealand
- Norway
- Portugal
- San Marino
- Singapore
- Slovenia
- Spain
- Sweden
- Switzerland
- UK

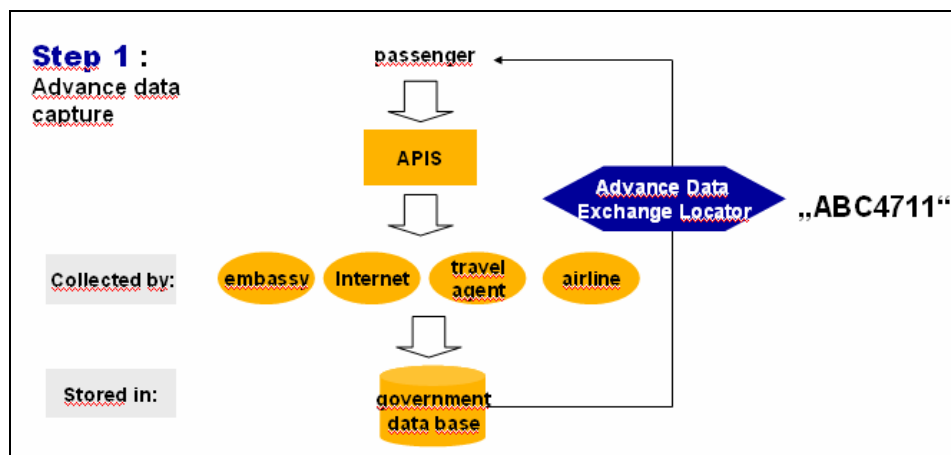
Basically citizens of above mentioned countries are familiar with the internet and can provide the required information in advance via a web page or a provider link (for example SITA link similar to Australian Advance Passenger Processing “APP”).

After transmitting this information directly to the requiring authority, an acknowledgement in form of an ADEL will be sent to the passenger. This can be an alpha-numeric number e.g. “ABC4711”.

1.2. Nationals:

Those passengers hold a unique identifier to be used as an ADEL; for example passport number, national security number, or similar.

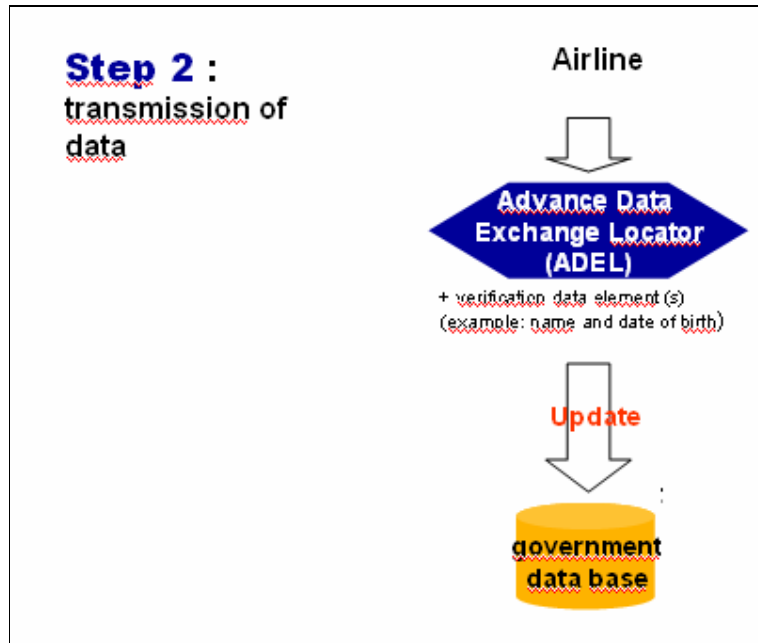
Otherwise Nationals can use the same channels to provide the contact information as the Visa Waiver passengers.



2. Data transmission

At time of check-in, two steps are taken:

1. The airline verifies whether the passenger is holding an ADEL (passengers without an ADEL may use self-service devices to input contact information and receive an ADEL). This will assure a very high data sufficiency rate.
2. Adding the required flight information to the ADEL and transmitting this to the government data base.



Attachment 1:
 non-immigrant visa application form

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM				DO NOT WRITE IN THIS SPACE					
1. Passport Number		2. Place of Issuance: City		Country	State/Province		B-1/B-2 MAX	B-1 MAX	B-2 MAX
3. Issuing Country			4. Issuance Date (dd-mm-yyyy)		5. Expiration Date (dd-mm-yyyy)			Other _____ MAX	
6. Surnames (As in Passport)							Vice Classification: _____		
7. First and Middle Names (As in Passport)							Multi or _____		
8. Other Surnames Used (Maiden, Religious, Professional, Aliases)							Number of Applications _____		
9. Other First and Middle Names Used					10. Date of Birth (dd-mm-yyyy)			Months _____	
11. Place of Birth: City		Country	State/Province		12. Nationality			Issued/Refused _____	
13. Sex <input type="checkbox"/> Male <input type="checkbox"/> Female		14. National Identification Number (If applicable)		15. Home Address (Include apartment number, street, city, state or province, postal zone and country)					
16. Home Telephone Number			Business Phone Number			Mobile/Cell Number			
Fax Number			Business Fax Number			Pager Number			
17. Marital Status <input type="checkbox"/> Married <input type="checkbox"/> Single (Never Married) <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced <input type="checkbox"/> Separated		18. Spouse's Full Name (Even if divorced or separated. Include maiden name.)			19. Spouse's DOB (dd-mm-yyyy)				
20. Name and Address of Present Employer or School Name: _____ Address: _____									
21. Present Occupation (If retired, write "retired". If student, write "student".)				22. When Do You Intend To Arrive In The U.S.? (Provide specific date if known)			23. E-Mail Address		
24. At What Address Will You Stay In The U.S.?							BARCODE		

Attachment 2

Contact information and work history for non-immigrant visa applicant

U.S. Department of State				OMB APPROVAL NO. 1405-0144	
CONTACT INFORMATION AND WORK HISTORY				ESTIMATED BURDEN: 1 HOUR	
FOR NONIMMIGRANT VISA APPLICANT					
PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM PLEASE ATTACH AN ADDITIONAL SHEET IF YOU NEED MORE SPACE TO CONTINUE YOUR ANSWERS					
1. Last Name(s)		First Name(s)		Middle Name	
2. Date of Birth (mm-dd-yyyy)		3. Place of Birth Country	City/Town	State/Province	
4. Permanent Home Address and Telephone Number (include apartment number, street, city, state or province, postal zone, and country)					
5. Full Name and Address of Spouse (if applicable) (postal box number unacceptable)					
Name (Last, First, Middle)			Address		Telephone Number
6. Full Names and Addresses of Children, Parents, and Siblings (postal box number unacceptable)					
Name (Last, First, Middle)		Address		Relationship	Telephone Number
7. List at Least Two Contacts in Applicant's Country of Residence Who Can Verify Information About Applicant (do not list immediate family members or other relatives) (postal box number unacceptable)					
Name (Last, First, Middle)		Address		Telephone Number	
Paperwork Reduction Act Statement					
<small>*This reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, reviewing the information required, and reviewing the final collection. In accordance with 5 CFR 1320.530, persons are not required to respond to the collection of this information unless this form displays a currently valid OMB control number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to U.S. Department of State (A/RPL/DIR) Washington, DC 20520.</small>					
20-158 04-2003		Page 1 of 2			