



Terrorist Screening Center
935 Pennsylvania Avenue, N.W.
Washington, D.C. 20535

October 7, 2005

Ms. Gale Rossides
Chair, Aviation Security Advisory Committee
Transportation Security Administration
601 South 12th Street
Arlington, VA 22202

Dear Ms. Rossides:

The Terrorist Screening Center (TSC) is submitting this letter to supplement the record related to the Report of the Secure Flight Working Group of the Aviation Security Advisory Committee, dated September 19, 2005 (Working Group Report).

The TSC was created by Homeland Security Directive 6 (HSPD-6), dated September 16, 2003. The TSC is a multi-agency organization charged with consolidating the government's approach to terrorism screening and providing for the appropriate and lawful use of terrorist information in screening processes. The TSC maintains the United States Government's consolidated terrorist watchlist, known as the Terrorist Screening Database (TSDB).

The TSC would like to clarify some of the issues raised in the Working Group Report regarding the criteria for inclusion of individuals in the TSDB. For instance, the Report included statements implying that the criteria are frequently changing and unclear. It also included a statement implying that the TSDB includes individuals who have tenuous connections with terrorist activity based only on a distant familial relationship.

The TSDB is the consolidated screening watch list developed and maintained by the TSC that includes the identities of both domestic and international known or appropriately suspected terrorists. HSPD-6 provides the minimum substantive criteria for placing the name of an individual on the consolidated terrorist watch list. In accordance with HSPD-6, an individual may be included in the TSDB only if he is "known or appropriately suspected to be or have been engaged in conduct constituting, in preparation for, in aid of, or related to terrorism."

The TSC receives international terrorist nominations from the National Counterterrorism Center (NCTC). The NCTC receives terrorist information from the Intelligence Community and other executive branch agencies and departments. If the NCTC determines that an individual meets the "known or appropriately suspected" standard of HSPD-6, it will identify that individual for inclusion in the TSDB. The TSC receives domestic terrorist nominations from the

Federal Bureau of Investigation (FBI), also based on the "known or appropriately suspected" standard of HSPD-6.

The TSC reviews nominations to the TSDB on a case-by-case basis to determine whether the nominated individual is an appropriate candidate for inclusion in the TSDB. The TSC reviewer evaluates both the quality of the substantive information and the sufficiency of identifying information pertaining to that individual.

Subsets of the TSDB are exported to several Federal agencies that conduct terrorism screening, including the Transportation Security Administration (TSA). The subsets exported to TSA are made up of individuals who meet the substantive criteria for inclusion in the No-Fly or Selectee lists established by the Homeland Security Council. TSA uses the export from the TSDB to create the No-Fly and Selectee Lists for aviation security screening. Individuals in the TSDB are designated for inclusion on the No-Fly or Selectee Lists if they meet certain substantive threat criteria, which are in addition to the "known or appropriately suspected" standard of HSPD-6. The TSC reviews to ensure that individuals designated for export to TSA for inclusion on the No-Fly and Selectee Lists meet the applicable substantive criteria.

Please include these comments with any other comments on the Working Group Report and make them publicly available to the same extent. Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Bucella', with a large, sweeping flourish extending to the right.

Donna A. Bucella
Director