

INFORMATION COLLECTION SUPPORTING STATEMENT

Registered Traveler Program

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).***

Section 109 of the Aviation and Transportation Security Act (ATSA) provides the Transportation Security Administration (TSA) with the authority to “establish requirements to implement trusted passenger programs and use available technologies to expedite security screening of passengers who participate in such programs, thereby allowing security screening personnel to focus on those passengers who should be subject to more extensive screening.” TSA’s Registered Traveler (RT) program is being piloted under the authority of this section. TSA will facilitate a partnership with the private sector to establish an interoperable, vendor-neutral RT program in the United States. RT potentially offers advantages for the TSA, industry, and the traveling public primarily through enhanced security and customer service.

TSA has been conducting a RT Pilot Program to test this concept with OMB’s approval since late June 2004. TSA is seeking a revision of this collection so it may expand the RT Pilot Program and add additional locations. This expansion, called the Registered Traveler Interoperability Pilot (RTIP), will evaluate technologies and business processes related to the RT concept including interoperability and a private/public partnership model of RT. Based on the RTIP, TSA will incorporate lessons learned and best practices followed by a Notice of Proposed Rulemaking (NPRM) for the national program.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.***

TSA will be gathering information in relation to the RTIP through three mechanisms. For all three mechanisms, TSA received approval for the substance of the information tools through previous Information Collection Requests (ICR). First, TSA requested a Statement of Interest (SOI) from all airports/air carriers interested in participating in the RT program. The SOI is a collection of basic information TSA is using to determine the level of interest and intent to participate in the RT program.

Second, as part of the pre-qualification process for companies that wish to participate in RT SPs, TSA will collect certain personally identifying information on company officers and key personnel and basic financial information about the company in order to verify the company’s identity and assess whether a security risk exists should that vendor participate in RT. TSA will use the identifying information, such as name, contact information, and date of birth, to conduct a security threat assessment (STA) and collect fingerprint images to

conduct fingerprint-based Criminal History Records Check (CHRC) on the company officers and key personnel. TSA has uploaded the Service Provider application in ROCIS.

Third, an application form will solicit biographic information from RT applicants before they join the program. RT applicants provide express written authorization to collect this information and provision of the information is voluntary. This information will be collected by SPs, which must be sponsored by an airport or air carrier participating in the RT program. The SPs create their own application forms, which TSA does not design or control. SPs may collect additional information from applicants for their own business purposes, beyond that which TSA requires to conduct a name-based STA. Each SP web site includes a statement that additional information beyond biographic collected by SPs is not endorsed by TSA. During this enrollment process, SPs will collect biographic and biometric information from RT applicants, transmit it to the TSA contractor which operates the Central Information Management System (CIMS), where it will be formatted and transmitted to TSA in order to perform a name-based STA. Based on the results of the STA, applicants will receive an approved or not approved STA and those results (approved/not approved) will then be transmitted back to the CIMS and retrieved by the SP. The SP will then issue RT cards to approved applicants that contain the individual's biometric template. TSA requires the use of biometric data to verify the identity of Registered Travelers at the airport security checkpoint.

TSA will use the applicants' information for the following purposes: to pre-screen travelers by conducting STAs; to accept applicants who receive an approved STA finding; to expedite security screening at airport checkpoints for approved Registered Travelers by using advanced identification technologies, including biometrics; to assist in the management and tracking STA results for RT applicants and RT participants; to permit the retrieval of STA results; and to refer to the appropriate intelligence and law enforcement entities the identity of RT applicants or RT participants who pose or are suspected of posing a threat to transportation or national security.

3. ***Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.***

In compliance with the Government Paperwork Elimination Act (GPEA), all collection elements of the RT program may be submitted to TSA electronically. For example, RT applicants will be required to enroll in person at a designated RT enrollment center where an SP sponsored by an airport or air carrier participating in the program will enter their information electronically. This not only fulfills the requirements of the GPEA, but it also facilitates the collection and processing of the data and provides an efficient means of retrieving information.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.**

Since 9/11, key aviation stakeholders have asked TSA to provide leadership and direction in assessing the feasibility of the RT concept.

Prior to establishing the RT Program Management Office (PMO), TSA directed a contractor to determine whether any other programs or organizations were collecting similar information and data that could be leveraged by the RT Pilot Program. It was determined that no programs or organizations were collecting information and data that met the security and procedural requirements of the RT Pilot Program.

- 5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.**

There is no significant burden to small businesses.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Without collecting the information from airports, air carriers, and companies that seek to participate in the RTIP, TSA will be unable to select qualified Sponsoring Entities and Service Providers that meet TSA-mandated standards. Without gathering the information and data needed to enroll individuals in the RTIP, TSA cannot verify an individual's identity, conduct an STA or permit the SP to issue an RT card

- 7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).**

This collection is consistent with 5 CFR 1320.5(d)(2).

- 8. Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

TSA provided notice of its intent to seek approval of a new information collection to expand the RT Pilot Program beyond the pilot phase in the Federal Register on December 16, 2005

(70 FR 74837). Although there has been much interest in the RT concept, TSA did not receive any comments addressing the burden estimates provided in the Federal Register. TSA ultimately decided to seek approval for a revision of this control number in order to extend the pilot further, rather than seek an entirely new control number at this point, hence the reason for the emergency submission. After receiving emergency approval, TSA provided notice of its intent to seek renewal of this collection of information on July 18, 2006 (71 FR 40731). To TSA's knowledge, no comments were received on the information collection aspect of this collection.

In addition, TSA has been working with and will continue to work closely with many public and private stakeholders to develop and implement the most efficient and secure system possible.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

TSA will not provide payment or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

TSA has not provided assurances of confidentiality to respondents. However, the surveys will be conducted on an anonymous basis.

11. Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

TSA does not seek sensitive information from RT applicants.

12. Provide estimates of hour burden of the collection of information.

TSA will be gathering information in relation to the RTIP through three mechanisms. First, TSA is suggesting airports/air carriers interested in participating in the RT program submit an SOI. Second, as part of the pre-qualification process for companies who wish to participate in RT as SPs an application form will solicit personally identifying information on company officers and key personnel and basic financial information about the company. Third, an application form will solicit biographic information from potential participants before they join the program. For all three mechanisms, TSA received approval the substance of the information tools through previous ICRs.

Airport/Air Carrier Statement of Interest

In our previous ICR submission, TSA estimated that 10-20 airports/air carriers would participate in the RTIP. Based on increased airport/air carrier interest, TSA currently estimates that up to 30 airports/air carriers will apply to participate and that it will take each

airport approximately 1 hour to prepare and submit their SOI, for a total hour burden of 30 hours. TSA also will require airports or air carriers seeking to participate in the RTIP to submit other documents as necessary describing how the program will operate, which will include preparing and submitting a Validation and Verification Report demonstrating how its operations comport with TSA-issued RT guidelines. TSA estimates that a maximum of 30 airports will submit this documentation, with an hour burden of approximately 40 hours per airport, for a total of approximately 1,200 hours. Thus, TSA estimates the total hour burden for the airport participation approval process to be approximately 1,230 hours (30 hours + 1,200 hours).

	Minimum	Maximum
Number of Airports/Air Carriers Submitting Statement of Interest	15	30
Number of Airports/Air Carriers Submitting other supporting documentation	15	30
Total Burden Hours	615	1230

Service Provider Applications

TSA will require that all SPs complete an application form prior to participation in the RT program. TSA will use this information to assess qualifications of the SP and determine whether a security risk exists should that vendor participate in RT. TSA will use the identifying information, such as name, contact information, and date of birth, to conduct an STA and fingerprint-based CHRC on the company officers and key personnel. TSA estimates that it will collect the information necessary to conduct the STAs from up to 12 companies, with approximately 25 persons per company affected and with an hour burden of approximately 3 hours per person. Thus, TSA estimates the hour burden for the collection of STA information to be 900 hours. TSA also will require participating companies to submit general information (organizational, legal, and ownership) about themselves so that TSA can ensure the company does not present a known security risk in relationship to RT. TSA estimates the hour burden per company for this aspect of the collection to be approximately 12 hours for a total of 144 burden hours. Thus, TSA estimates the total hour burden for the company pre-qualification process to be approximately 1,044 hours (900 hours + 144 hours).

	Minimum	Maximum
Number of Companies	6	12
Number of Employees per Company	25	25
Estimated Total Processing Time in Hours	522	1044

Participant Applications for Expansion of Pilot

There are currently 28,000 participants in the RT Pilot. Based on the current RT Fee Model, the potential population size during the expansion of the pilot will range from 180,000 (12,000 participants x 15 participating airports/air carriers) to 900,000 (30,000 participants x 30 participating airports/air carriers). For the RT Pilot Program participants, we expect a

maximum of 900,000 respondents and based on an estimate of a 20-minute burden per respondent, a maximum total burden of 300,000 burden hours for participant applications.

	Minimum	Maximum
Number of Locations	15	30
Participants per Location	12,000	30,000
Population Size	180,000	900,000
Total Burden Hours	60,000	300,000

The RT program will require that all applicants complete an application providing biographic information that TSA will use to conduct STAs. Biometric data (fingerprints and iris data) will also be collected. It is expected that the entire population (up to 900,000 participants--less the 28,000 current participants) will complete these forms and provide biometric data.

Listed below is the breakdown for the methods TSA will use for collection of information.

	Estimated Respondents		Time per Response (Hrs)	Estimated Burden Hours	
	<i>Min</i>	<i>Max</i>		<i>Min</i>	<i>Max</i>
Airport/Air Carrier Statements of Interest	15	30	1.0	15	30
Airport/Air Carrier other supporting documentation	15	30	40.0	600	1200
Service Provider Applications ¹	6	12	12.0	72	144
Service Provider Employee Applications	150	300	3.0	450	900
Participant Applications	180,000	900,000	0.33	60,000	300,000
Total Burden Hours				61,137	302,274

Total Annual Burden: TSA estimates the maximum total burden for all collection pieces of this ICR is 302,274 hours.

Total Annual Number of Respondents: The maximum number of respondents for all aspects of this program is 900,312 respondents.

¹ The Service Provider and Service Provider Employee Applications are in one document, titled "Service Provider Application."

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

Only a portion of the fee charged to voluntary RT applicants, which covers the cost for TSA to fulfill its responsibilities under the RT program, will be forwarded to TSA. TSA estimates this to be approximately \$28 per participant. This includes the cost to convert participants of the existing Orlando pilot program to the new phase. Thus, TSA estimates the total annual cost burden to respondents or record keepers resulting from the collection of information is \$25,200,000 [$\$28 \times 900,000$]

TSA estimates that the Service Provider applicant companies will be charged \$43 per employee for the STAs and CHRCs, for a total annual cost of \$12,900 [$\43×300 employees].

TSA estimates the costs the airports will incur as a result of preparing and submitting the other supporting documentation to TSA if they wish to participate in the RT program will be approximately \$2,400,000. This cost is attributed to the likelihood that airports will require the services of a Certified Public Accountant to complete the Validation and Verification Report for their vendors. TSA estimates that between 6 and 12 vendors will participate in Registered Traveler at a cost of approximately \$200,000 per company, with the cost burden ranging between \$1,200,000 (for 6 companies) and \$2,400,000 (for 12 companies).

Thus, the total annual cost burden for all aspects of this collection will be \$27,612,900.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.

The estimated cost to the Government for STAs will be recovered in the fee charged to the RT participants. TSA will not assume the costs for enrollment in this pilot program, rather, the private partner will perform these business processes (or hire a contractor to do so) and TSA will provide standards and guidelines.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

As discussed above, due to positive responses to the current pilot, the need to evaluate systems interoperability, and the need to conduct a robust metrics analysis, TSA has extended the current pilot program. The program changes reflected in items 13 and 14 are the result of this extension. Specifically, the burden increased due to the expansion of the potential number of respondent airports/air carriers and the setting of a fee for program participants. TSA anticipates that as the program expands, the number of potential respondents will increase (for example, participant airports/air carriers, Service Providers (SPs), and the number of individual program participants); thus, TSA has built this change potential into its burden estimates.

Additionally, TSA has decided not to administer two instruments (customer satisfaction surveys and stakeholder interviews) described in previous submissions of this ICR. The intent of these instruments was to measure satisfaction of RT Pilot Program participants and key stakeholders. However, after further evaluation, TSA has determined that the SPs, which market the program and are the point of contact for program participants, are in the best position to measure customer satisfaction if they so choose. TSA has removed these instruments from our ICR.

Breakdown of burden increase/decrease for each collection:

Collection	Previous ICR burden estimate	Current ICR burden estimate
Airport/Air Carrier Statement of Interest	850 hours (for 20 airports/air carriers) \$2,400,000 cost	1230 hours (for 30 airports/air carriers) \$2,400,000 cost
Service Provider Pre-Qualification	1,044 hours	1,044 hours
Participant Enrollment	396,000 hours \$8,000,000 cost (assuming 1,200,000 participants)	300,000 hours \$25,200,000 cost (assuming 900,000 respondents X \$28 fee)
Surveys	72,000 hours	0*
Stakeholder Interviews	120	0*

*These collections have been removed from TSA's Information Collection Request.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

TSA will not publish results from this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

TSA is not seeking such approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

TSA does not seek any exception to the certification statement.