



We the undersigned are strongly opposed to the U.S. Exit rule proposed by the Department of Homeland Security that would force airlines and cruiselines to collect fingerprints from most foreign travelers exiting the United States. We urge Congress to take the steps necessary to prevent DHS from pursuing this unworkable, misguided proposal.

Immigration and border control cannot be outsourced to the private sector.

- Fingerprinting programs (like U.S. Exit) are inherently government functions
- It is our understanding that Congress did not intend for this national security program to be operated by private industry
- In proposing this rule, DHS is seeking to offload one of its core responsibilities on the airline and the cruise industries

The proposed rule would result in significant travel delays and unnecessary passenger privacy risks.

- Estimates are that the collection of fingerprints would add an additional hour to the check-in process for each international flight
- Cumulatively, our airports and passengers would struggle with long lines, significant delays and missed connections
- The DHS NPRM acknowledges that an airline/cruiseline collection process would be more likely to compromise the integrity of highly sensitive biometric passenger data than a DHS run system
- The DHS proposal is not compatible with the privacy protections other countries guarantee their citizens

The proposed rule would exponentially increase costs to private industry.

- DHS estimates that it would cost industry between \$3.5B and \$6.1B to implement and manage the fingerprint collection process. We believe DHS significantly underestimated the cost of this program by not including non-gateway airports or the cost of building new networks to transmit large data files
- 75,000 airline and XXXX cruise line employees, none of whom are sworn officers of the law, would have to be trained to support biometric collection
- It is unreasonable to require airlines and cruiselines to absorb these costs, particularly at a time when the price of oil is at prohibitive, historic highs

The rule proposed by DHS is unacceptable to industry stakeholders. In no circumstance should private industry be enlisted as an immigration and border patrol authority. We urge you to oppose any attempt by DHS to delegate this inherently government responsibility to private industry.

Thank you for your consideration of this matter,
which is of great consequence to us and to the traveling public.

Abdul Wahab Teffaha

Secretary General
Arab Air Carriers Organization