

AVIATION ASSEMBLY COMMENTS AT DHS PUBLIC MEETING, 13 JUNE 2008

US VISIT: Exit Procedures

- **The Aviation Assembly is an informal lobby group of aviation attaches drawn from 34 embassies in Washington DC, plus the Delegation of the European Commission. The following comments have been agreed by the governments represented in the Assembly by those embassies.**
- **We recognise the Department of Homeland Security is acting on a mandate from Congress - and an unfunded one at that - which requires an exit procedure to be put in place.**
- **It is not for the Assembly to question that mandate. However, we are seriously concerned that its execution will be delegated to commercial airlines. We believe that border controls or checks on entry and exit are more properly a function of government.**
- **Several of the governments represented by members of the Assembly have re-introduced emigration procedures, but have required the relevant government agency to provide for and run this function.**
- **We also recognise that airlines in many airports around the world already provide some support to governments, for example in checking the validity of travel documents. But the proposal here as we understand it would be far more detailed and resource-intensive than anything that is currently handled by airlines on immigration issues**
- **In common with US carriers, the airlines based on the territory of Aviation Assembly members have business models that introduced significant reductions in ground staff located at check-in desks and gateways, with airlines**

relying instead on technology to assist passengers in an increasingly self-serve environment.

- Requiring these carriers to reverse that model and to do so without any financial, technical and political support would place a significant burden on the industry.
- There are potential complications, involving privacy and liability issues, with commercial organisations securing, holding and transmitting to government agencies sensitive biometric data. We believe these need to be looked at again carefully to avoid exposing airlines to unnecessary risk.
- However, our overall conclusion is that the implications of imposing an expensive government function on an industry already facing severe financial constraints - and clearly looking at further downsizing to avoid collapse - are so severe they require further consultation, reflection and reworking.

Clive Wright
Chairman
Aviation Assembly, Washington DC

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