

**BEFORE THE  
DEPARTMENT OF HOMELAND SECURITY  
WASHINGTON, D.C.**

_____ )	
In the Matter of )	
Collection of Alien Biometric Data Upon Exit )	
From the United States at Air and Sea Ports of )	Docket DHS-2008-0039
Departure; United States Visitor and Immigrant )	
Status Indicator Technology Program )	
("US-VISIT") )	
8 CFR Parts 215, 231, and 235 )	
19 CFR Parts 4 and 122 )	
RIN 1601-AA34 )	
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**REQUEST BY UNITED AIR LINES, INC.**  
**For a 60 Day Extension of the Comment Period**

Communications with respect to this document should be sent to:

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Dated: May 13, 2008

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On April 24, 2008, the Department of Homeland Security ("DHS") proposed to establish an exit program at all air and sea ports of departure in the United States. This proposed rule would require aliens who are subject to United States Visitor and Immigrant Status Indicator Technology Program ("US-VISIT") biometric requirements upon entering the United States to provide biometric information to commercial air and vessel carriers before departing from the United States at air and sea ports of entry.

The NPRM provides only 60 days, until June 23, 2008, for the public to comment on this rulemaking. United Air Lines, Inc., ("United") respectfully requests an additional 60 days to submit comments regarding this NPRM, citing the following factors:

1. The NPRM asks for detailed comments on "discrete elements of the proposal, including on-point operational and financial data and the potential economic and business

impacts from performance standards proposed under this rule.” 73 Fed. Reg. 22066. It is unrealistic to expect United to be able to complete this comprehensive analysis in the 60 days provided.

2. While there have been general discussions about the U.S. Exit program for some time, the April 24 NPRM was the first opportunity for United to review the details of the DHS proposal.

3. The NPRM as drafted raises a number of technical, business, legal and privacy issues, all of which must be carefully analyzed before comments can be submitted.

4. The NPRM suggests that this proposed U.S. Exit system would cost the private sector \$3.6 to \$6.1 B over ten years. This estimate may underestimate costs by as much as 100 percent according to the Regulatory Impact Analysis. United believes that the NPRM estimate is an unrealistically low estimate of the true cost of the program as envisioned. Particularly given the uncertainty around cost estimates, it is imperative that DHS have the benefit of a comprehensive financial analysis of its proposal. United cannot adequately complete this task within the 60-day time frame.

We recognize that DHS is under an obligation to address its responsibilities under U.S. VISIT in a timely fashion. While we appreciate the fact that a 60-day extension will put added pressure on these Congressional deadlines, it is imperative that United have the opportunity to provide DHS with its best analysis of this highly complex issue with its real implications for costs, operations and customer service.

Thank you in advance for your consideration.

Respectfully submitted,

A handwritten signature in cursive script that reads "Mary Barnicle".

MARY BARNICLE  
Manager – International & Regulatory  
Affairs  
UNITED AIR LINES, INC.

**May 13, 2008**