

**Transportation Security Administration**  
**Docket No. TSA-2004-19515**  
**Notice of Proposed Rulemaking (NPRM)**  
**Air Cargo Security Requirements**

**Comment**

**We recommend that TSA require companies requesting Indirect Air Carrier (IAC) or Known Shipper status to submit a valid DUNS Number with their application.**

**The DUNS Number**

The DUNS Number is a nine-digit non-indicative business identifier assigned by Dun & Bradstreet to identify unique business entities. A DUNS Number is assigned to each commercial, non-profit, or government entity in D&B's database which covers 90 million records in over 200 countries. Once assigned, a DUNS Number stays with the company for the life of the business and is not reused or reissued to another entity.

As the de facto business identification standard, the DUNS Number provides a link to critical information, maintained by D&B, which can be used as a component of TSA's risk-assessment methodology. This is appropriate not only as a component of TSA's process of certifying IACs, but also as a means of supplementing the certification information provided by IACs on their Known Shipper customers. For example, by leveraging the DUNS number, TSA can obtain the following information:

- Automated notification of change in business address, ownership, or bankruptcy.
- Corporate linkages that identify relationships between a company and its subsidiaries or parent organization.
- Creditworthiness and financial stress indicators which may indicate susceptibility to coercion.
- The line of business associated with each entity.
- Business size (number of employees and revenues).
- Number of years in business, and number of years under current ownership.

Access to accurate and timely information is a critical component of the TSA's mission to improve air cargo security, and by requiring a DUNS number for each IAC and Known Shipper, TSA can ensure the availability of the most up-to-date business information available on each of these entities.

**DUNS Number and the Federal Government**

Requiring a DUNS Number for IACs and Known Shippers is consistent with existing policies within the federal government, where the DUNS Number has become the standard business identifier.

- The Federal Acquisition Regulations (FAR) require all companies doing business with the federal government to have a DUNS Number. Through the use of the DUNS Number in the Central Contractor Registry (CCR), the government ensures consistent identification of suppliers across all government agencies.
- The Office of Management and Budget issued a directive to require grant applicants to provide a DUNS Number when applying for Federal grants or cooperative agreements.
- The US Postal Service uses the DUNS Number as the corporate standard for customer identification.
- The Department of Education uses the DUNS Number to identify schools and lenders in its Student Financial Assistance Programs.
- The Department of Transportation utilizes the DUNS Number to standardize business entities in its hazardous materials files.

### **Benefits**

By requiring a DUNS Number in order to register as an IAC or Known Shipper, the TSA would gain the following benefits:

- Ensuring that IAC or Known Shipper is a valid business registered in the D&B database.
- Leveraging a global standard for business identification with widespread acceptance within the federal government.
- Expediting the review process through the use of constantly maintained third-party data.
- Identifying and eliminating duplicate business records within TSA systems through a standard identifier.
- Ensuring that IACs are also not also listed as Known Shippers.
- Providing an identifier for IACs and Known Shippers that allows them to be easily linked to business records in other government and commercial systems.
- Leveraging additional D&B background information on businesses in the IAC vetting process.
- Corroborating Known Shipper information supplied by IAC's through a trusted third-party.
- Allowing the TSA to identify a unique Known Shipper submitted by multiple IACs.

The process would also have benefits for industry, including:

- Ensuring the business information submitted to the TSA by IACs is accurate and up-to-date.
- Expediting the review and approval process by providing additional sources of data to corroborate information submitted by the IACs.
- Providing IACs with a unique identifier to manage their Known Shippers.

- Allowing IACs to leverage D&B data for insight into business changes associated with their Known Shippers.

### **Recommended Procedure**

Most IAC's and Known Shippers, as business entities, already have DUNS Numbers. For those that do not, a DUNS Number could be provided immediately by a toll-free telephone number. The time commitment to apply is approximately 15 minutes and the applicant would be asked to provide the following information: (1) Company name, (2) Company address, (3) Company telephone number, (4) Line of business, (5) Chief executive officer/key manager, (6) Date the company was started, (7) Number of people employed by the company, (8) Company affiliation.

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