

Secure Flight is not a security scheme. It is a surveillance scheme. Secure Flight initiates an enormous government database of travel information about innocent citizens, and will yield absolutely no useful or necessary data relevant to preventing terrorism. Even the proposed test of Secure Flight, involving travel records from June 2004, will contain no examples of terrorists, since there were no terrorist actions on U.S. planes in June 2004. The surveillance purpose of Secure Flight does not relate to the performance of any TSA functions.

Amadeus, a reservations processing center based in the E.U., can not legally comply with the requirements of Secure Flight. The agreement negotiated previously between the USA and the European Commission does not apply to Secure Flight, but only to testing of CAPPS-II. The burden imposed by Secure Flight, asking a corporation to violate the EU Data Protection Directive and other EU national data protection laws, is surely excessive.

All American airlines and reservations systems will be forced to cease accepting EU reservations if Secure Flight comes to pass. The economic cost of ceasing to do business with over 400 million travelers in the E.U. can only further weaken our already struggling airlines.

The TSA can meet its operational goals without access to any of the information demanded in the Secure Flight proposal. In particular, data on many non-travelers will be included in the passenger PNRs: people who made reservations but never travelled, people who paid for other people's tickets, travel agents, and airline staff. Information on these individuals can not possibly relate to the prevention of incidents on airplanes since these individuals do not board airplanes.

What would actually increase the quality, clarity, and utility of the information collected is to have TSA employees themselves collect the information required from travellers at the checkpoint. After all, most people would be more loath to falsify information to the TSA at a checkpoint than to an anonymous airline agent over the telephone. Many travelers, including me, assume false addresses and phone numbers in their dealings with companies, but would answer truthfully if confronted by a TSA agent. This would also solve the problem of non-travelers being caught up in the information dragnet of the Secure Flight proposal. In-person data collection at TSA checkpoints would also lessen the enormous burden on airlines and other travel providers, estimated reliably in the range of hundreds of millions to a billion dollars. Still, speaking as a frequent traveler myself, I know that I will feel no safer and much less free for having the government tracking and tracing my movements from place to place within my own country.