



We the above-referenced global, regional and national trade associations are strongly opposed to the US 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 proposal.

Immigration and border control are firmly government functions.

- Fingerprinting programs (like US Exit), immigration and border control are inherently government functions
- Congress intended for this national security program to be operated by DHS
- In proposing this rule, DHS is seeking to offload one of its core responsibilities on the airline and the cruiseline industries
- DHS proposes to enhance this system to include real-time prescreening of foreign passengers against criminal databases and terrorist watch lists, placing airline employees squarely in the arrest and apprehension process

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

- Estimates are that the collection of fingerprints would significantly slow down 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 \$6.4B to implement and to 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 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

The rule proposed by DHS is unacceptable to industry stakeholders and to our passengers. We urge you to oppose this attempt by DHS to delegate an 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.**