



Homeland Security

Privacy Office

November 2, 2007

Ms. Marcia Hofmann
Electronic Frontier Foundation
454 Shotwell Street
San Francisco, CA 94110

Re: DHS/OS/PRIV 07-90/Hofmann request

Dear Ms. Hofmann:

This is our twelfth partial release to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), dated October 20, 2006, for DHS records concerning Passenger Name Records (PNR) from May 30, 2006 to the present including:

1. Emails, letters, reports or other correspondence from DHS officials to European Union officials concerning the transfer and use of passenger data from air carriers to the US for prescreening purposes;
2. Emails, letters, statements, memoranda or other correspondence from DHS officials to U.S. government officials or employees interpreting or providing guidance on how to interpret the undertakings;
3. Records describing how passenger data transferred to the U.S. under the temporary agreement is to be retained, secured, used, disclosed to other entities, or combined with information from other sources; and
4. Complaints received from EU citizens or official entities concerning DHS acquisition, maintenance and use of passenger data from EU citizens.

In our December 15, 2006 letter, we advised you that we had determined multiple DHS components or offices may contain records responsive to your request. The DHS Office of the Executive Secretariat (ES), the DHS Office of Policy (PLCY), the DHS Privacy Office (PRIV), the DHS Office of Operations Coordination (OPS), the DHS Office of Intelligence and Analysis (OI&A), the DHS Office of the General Counsel (OGC), the Transportation Security Administration (TSA), and U.S. Customs and Border Protection (CBP) were queried for records responsive to your request. In our July 27, 2007 letter, we advised you that we expanded our search to include U.S. Immigration and Customs Enforcement (ICE).

Continued searches of the DHS components produced an additional 31 documents, consisting of 144 pages, responsive to your request. I have determined that 14 documents, consisting of 85 pages, are releasable in part; and 17 documents, consisting of 59 pages, are withholdable in their entirety. The releasable information is enclosed. The withheld information, which will be noted on the *Vaughn* index when completed, consists of names, telephone numbers, email addresses,

deliberative material, legal opinions, law enforcement information, and homeland security information. I am withholding this information pursuant to Exemptions 2, 5, 6, and 7(E) of the FOIA, 5 USC §§ 552 (b)(2), (b)(5), (b)(6), and (b)(7)(E).

FOIA Exemption 2(low) exempts from disclosure records that are related to internal matters of a relatively trivial nature, such as internal administrative tracking. FOIA Exemption 2(high) protects information the disclosure of which would risk the circumvention of a statute or agency regulation. Included within such information may be operating rules, guidelines, manuals of procedures for examiners or adjudicators, and homeland security information.

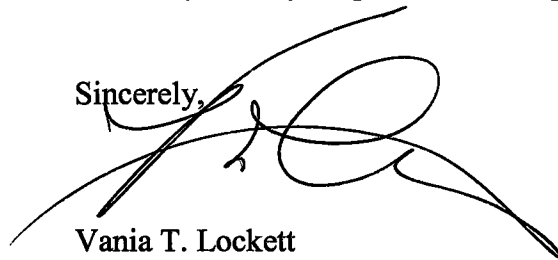
FOIA Exemption 5 protects from disclosure those inter- or intra-agency documents that are normally privileged in the civil discovery context. The deliberative process privilege protects the integrity of the deliberative or decision-making processes within the agency by exempting from mandatory disclosure opinions, conclusions, and recommendations included within inter-agency or intra-agency memoranda or letters. The release of this internal information would discourage the expression of candid opinions and inhibit the free and frank exchange of information among agency personnel. The attorney-client privilege protects confidential communications between an attorney and his client relating to a legal matter for which the client has sought professional advice. It applies to facts divulged by a client to his attorney, and encompasses any opinions given by an attorney to his client based upon, and thus reflecting, those facts, as well as communications between attorneys that reflect client-supplied information.

FOIA Exemption 6 exempts from disclosure records the release of which would cause a clearly unwarranted invasion of personal privacy. Weighed against the privacy interest of the individuals is the lack of public interest in the release of their personal information and the fact that the release adds no information about agency activities, which is the core purpose of the FOIA.

Finally, FOIA Exemption 7(E) protects records compiled for law enforcement purposes, the release of which would disclose techniques and/or procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.

Our office continues to process your request. If you have any questions regarding this matter, please refer to **DHS/OS/PRIV 07-90/Hofmann request**. The DHS Privacy Office can be reached at 703-235-0790 or 1-866-431-0486. Thank you for your patience as we proceed with your request.

Sincerely,



Vania T. Lockett
Associate Director, Disclosure & FOIA Operations

Enclosures: 85 pages

[b6] b6

From: Rosenzweig, Paul
Sent: Saturday, September 30, 2006 1:50 PM
To: Agen, Jarrod; Sciara, Nicolle; Baker, Stewart; Scardaville, Michael; [Isles, Adam]; Knocke, William
Subject: RE: PNR PAG

Have just finished talking to S2. [b5] we will be initialing the interim agreement and sending it to them for their approval

- > The Secretary has today initialed an interim agreement with the European Union that the United States believes fairly and fully resolves all of the EU's concerns and responds to the judgment of the European Court.
- > The interim agreement ensures that counter-terrorism information collected by the Department will be shared, as necessary with other federal agencies.
- > In the meantime, pending the formal approval of the interim agreement by the European Union, the United States has committed to leaving all other aspects of the Undertakings unchanged – no new data will be collected and no sensitive information will be reviewed.
- > The interim agreement has now been returned to the European Union for its final review and consideration.

b5 [] we look forward to finalizing an understanding ...
P

Paul Rosenzweig

[] b2

From: [Agen, Jarrod]
Sent: Saturday, September 30, 2006 1:36 PM
To: [Sciara, Nicolle]; Baker, Stewart; Rosenzweig, Paul; Scardaville, Michael; [Isles, Adam]; Knocke, William R;
Subject: RE: PNR PAG

Thanks, I'll adjust the PAG. But, I'll need a couple of sentences that explain "push" vs "pull" systems. Do you mean that air carriers are feeding us info rather than us delving into carrier records for it?

From: [Sciara, Nicolle]
Sent: Saturday, September 30, 2006 1:24 PM
To: [Agen, Jarrod]; Baker, Stewart; Rosenzweig, Paul; Scardaville, Michael; [Isles, Adam]; Knocke, William R;
Subject: RE: PNR PAG

There are a couple of key points that were discussed earlier – I'm not sure whether they need to be explicitly stated or just have ready for questions.

- We are not seeking an additional data elements – this is the same data that was permitted to be shared under the previous agreement.
- We have agreed to work towards a "push" system, which is considered less of a privacy concern than the current "pull" model.
- [b5]
- The issue for the US comes down to the need to break stovepipes among counterterrorism and law enforcement agencies.

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You might also want to be ready to explain that the European Court did not invalidate the substantive terms of the agreement relating to collection or treatment of the data. Rather, the Court ruling went to the authority of the European Commission to enter into the agreement.

[Nicolle Sciara Rippeon]
Acting Chief of Staff
DHS Assistant Secretary for Policy
[] b2

From: Ajen, Jarrod
Sent: Saturday, September 30, 2006 12:03 PM
To: Sciara, Nicolle; Baker, Stewart; Rosenzweig, Paul; Scardaville, Michael; Isles, Adam; Knocke, William R;
Subject: PNR PAG
5 b6]

Attached and pasted below is latest my latest PAG on PNR. It has been revised in the event we do not reach agreement. Let me know if you have any edits, there are other q/a's that we can continue to add. Do you have official word that negotiations have been called off?

TALKING POINTS

- [] b5
- Every nation has a legal and moral obligation to protect its borders, as it has a right to verify who it is admitting into the country. This department will simply not relinquish that sovereign right. and we will use every legal authority at our disposal, including valuable PNR data, to secure our homeland.
- We continue to be interested in reaching a PNR-related understanding with our European allies. Here in the United States and in Europe, we all have to be smart and thorough in scrutinizing people seeking to come into our country – including those who may not be on watchlists but could mean to do us harm.
- This is really about a question of timing. Much of the PNR information could be gathered from travelers when they arrive in the United States, or DHS could impose predeparture visa requirements soliciting this information, but this would seriously impede travel; the only way we can avoid such a scenario is to ask for the information electronically in advance of travel.
- We look forward to [b5] an understanding on this issue with our European allies, with whom we have a great relationship on a number of other security-related matters. and indeed to an international approach on PNR analysis.

QUESTION AND ANSWERS

Q. What is PNR and what is it used for?

A: Passenger Name Record (PNR) is the generic name given to records created by aircraft operators and can include a range of elements such as date of ticket reservation, date and place of ticket issue.

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payment details, passenger/travel agent contact details and travel itinerary. This is data that can be obtained from a passenger during an interview with US Customs and Border Protection officers upon arrival in the United States.

Per the Aviation Transportation Security Act (ATSA) DHS collects PNR information on travelers aboard flights bound for and departing from the U.S. Our current agreement with the EU reflects this U.S. statutory requirement, which strengthens aviation and border security, while also facilitating legitimate travel.

CBP uses PNR along with other information to conduct a risk assessment of each passenger in order to identify those that may pose a threat of terrorism. Access to this information is a foundational element of DHS's layered strategy for aviation and border security and also facilitates legitimate travel.

Q: Will the lack of agreement interrupt air travel between US and Europe?

A: The appropriate security information will continue to be exchanged through our relations with air carriers and European nations individually. Even though a new agreement has not been reached, planes will continue to fly uninterrupted and our national security will not be impeded.

Q: Why was no agreement reached? What is DHS demanding in the new PNR agreement?

A: Every nation has a legal and moral obligation to protect its borders, as it has a right to verify who it is admitting into the country. This department will simply not relinquish that sovereign right, and we will use every legal authority at our disposal. Limits should not be placed on the sharing of PNR data by U.S. Customs and Border Protection with other elements of the U.S. government; particularly including DHS, the Department of Justice, and their component agencies; for the investigation, analysis, and prevention of terrorism and other crimes.

Q: Who does DHS receive PNR data on?

A: DHS receives PNR data for all passengers flying to the United States

Q: How long does DHS want to store PNR data for?

A: We would like to store PNR data for as long as it has potential relevance for law enforcement and terrorism prevention purposes. Because we know terror attacks can be in the planning stages for several years, we want to store the info for longer than the current 3.5 year agreement.

Q: When does DHS begin collecting PNR data? Do you want to get it earlier?

A: We begin collecting PNR data up to 72 hours before flights for preliminary targeting. We would like to be permitted access to PNR outside of the 72 hour mark when there is an indication that early access could assist in responding to a threat to a flight or set of flights bound for the United States.

Q: With there be further negotiations?

A: We look forward to reaching an understanding on this issue with our European allies, with whom we have a great relationship on a number of other security-related matters, and indeed to an international approach on PNR analysis.

Q. What is the difference between Advance Passenger Information System (APIS) and Passenger Name Record (PNR) data?

A: APIS data refers to passenger information that is collected from government-issued identity documents accepted for international travel. APIS data is most commonly collected from passports and much of this information is resident in the Machine Readable Zone. APIS data comprises data elements such as Full Name, Date of Birth, Travel Document Number, Country of Issuance, etc.

PNR is the generic name given to records created by aircraft operators or their authorized agents for each journey booked on behalf of any passenger. The data is used by operators for their own commercial and operational purposes. PNR data comprises a range of elements such as date of ticket reservation, date and place of ticket issue, passenger/travel agent contact details and travel itinerary.

Q: Did the European Court of Justice rule that US data privacy protection is inadequate?

A: The Court did not rule against the availability of PNR data, it did not determine that privacy was violated, nor did it take a view on the content of the agreement. Rather, the court found that the European Council relied upon an inapplicable legal authority for entering into the agreement.

Q: How will the PNR agreement affect the Pre-departure APIS Notice of Proposed Rulemaking?

A: The Pre-departure APIS NPRM is not a new data collection-only a proposed timing change for APIS information already being collected under the APIS Final Rule Published on April 7, 2005. APIS is merely an automated vehicle for the collection of information from government-issued identity documents accepted for international travel. Essentially, APIS is the same as a border officer swiping or visually examining a passport presented by a traveler. The Pre-departure APIS NPRM does not contain any PNR related requirements. Thus, this rulemaking is not affected by the EU's recent PNR ruling.

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From:
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To:
Cc:
Subject:

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[b2 b6
Tuesday, July 11 2006 5:47 PM
; Scardaville, Michael;
Jacksta, Bob M
Re: For Review: PNR Issues Paper

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[b6 , this is an accurate depiction of our uses of APIS and PNR. Thanks.

----- Original Message -----

From: [b6
Sent: 07/11/2006 05:38 PM
To: "Scardaville, Michael"

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Cc: Jacksta, Bob M"

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Subject: Re: For Review: PNR Issues Paper

Mike--as I understand it [

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[b6]
Office of Chief Counsel
U.S. Customs and Border Protection
[b2]

Sent from my BlackBerry Handheld.

----- Original Message -----

From: "Scardaville, Michael" [b2]

Sent: 07/11/2006 05:12 PM

To: "Scardaville, Michael"

b2 b6

Cc: "Jacksta, Bob M"

Subject: RE: For Review: PNR Issues Paper

All,

On page 8, in response to the following sentence:

[b5]

Thanks

Mike

[b2]

-----Original Message-----

From: [b2 b6]
Sent: Monday, July 10, 2006 4:22 PM
To: Scardaville, Michael
Cc: b6 Jacksta, Bob M; b6
Subject: Re: For Review: PNR Issues Paper

Hello Mike,

Here are the collective comments from CBP.

(See attached file: SummaryofPNRIssues ALT FORMAT CLEAN (CBP comments 7-10-06).doc)

[b6]
OFFICE OF FIELD OPERATIONS
PASSENGER AUTOMATION PROJECTS OFFICE
WASHINGTON, DC 20229
[b2]

"Scardaville,
Michael" To:

b2 b6

07/06/2006 02:34

PM

'Jacksta, Bob M'

"Rosenzweig,
Paul"
"Scardaville,
Michael"

cc:

Issues Paper

Subject: For Review: PNR

All,

Attached is the revised PNR issues paper with your last round of comments. Please take one more scrub and let me know if you have any comments by Monday.

Thanks

Mike

(See attached file: SummaryofPNRIssues ALT FORMAT CLEAN.doc) (See attached file: SummaryofPNRIssues ALT FORMAT.doc)



Homeland Security

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September 5, 2006

MEMORANDUM FOR: Stewart Baker
Assistant Secretary for Policy

FROM: Nathan A. Sales
Deputy Assistant Secretary for Policy Development

SUBJECT: [b5] Uses of Passenger Name Records

[b5]

- **Enhanced Link Analysis.** Because of the strict limitations on sharing PNR information outside of CBP, other DHS components are required to make case-by-case requests for PNR information. In addition, the Undertakings currently limit CBP's access to 34 PNR data elements; a carrier's system may include many more data elements, such as frequent flier information beyond miles flown and address, phone numbers, credit card information,;

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- **Earlier and More Frequent Access to Vital Information.** Under today's restrictions, CBP cannot "pull" PNR data from airlines more than four times, nor can it receive more than four "pushes" from airlines, during the 72 hours prior to the departure of a U.S.-bound flight. C

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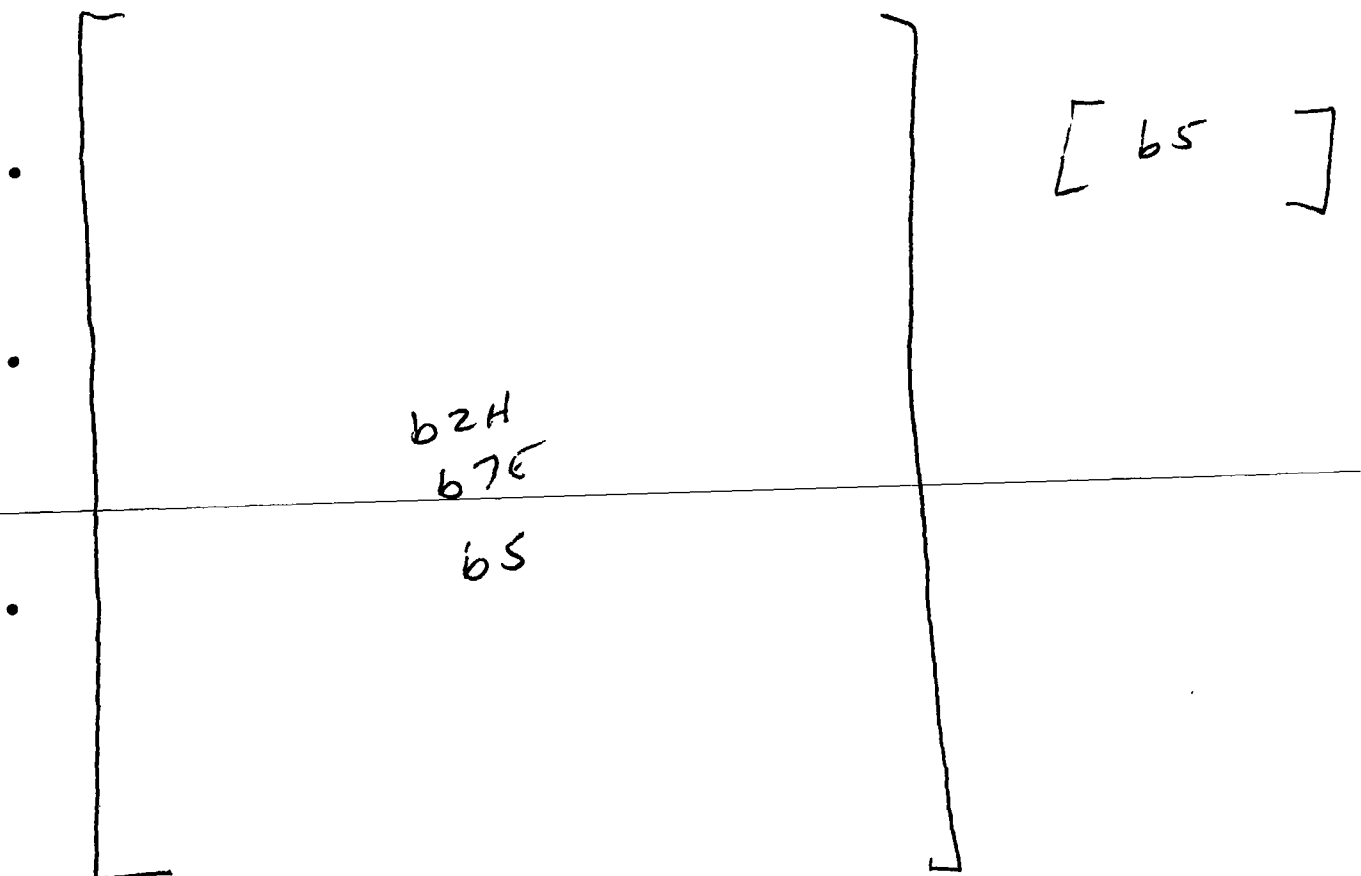
- **Investigations of Crimes Other than Terrorism.** Under the current Undertakings, DHS is precluded from sharing PNR information for matters that are not related to terrorism or serious "transnational" crimes. C

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- **Streamlined Review Process.** The Undertakings currently commit DHS to an annual joint review. The review held last year, while successful and useful, was a politically charged event that required significant DHS time and resources. The review began with a lengthy independent investigation by the DHS Privacy Office, which 45-page report. Then the European Commission conducted its own review, culminating in a 35-page report that found CBP in substantial compliance with the agreement but also “identified some areas for improvement and monitoring.” Replacing the joint review with a more a traditional, reciprocal (and flexible) consultation-and-review clause simultaneously would ensure that meaningful review takes place and would preserve scarce DHS resources for other vital projects.



Homeland Security

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INFORMATION

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MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy

THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and Councilor to the Assistant Secretary for Policy

FROM: Michael Scardaville, Special Assistant/International Policy Advisor

SUBJECT: Summary of potential changes to seek in the PNR Undertakings

Purpose

Per your request, below is a preliminary summary of areas of the Undertakings DHS may want to consider changing.

Likely Top Priorities:

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Homeland Security

June 12, 2006

INFORMATION

MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy

THROUGH: ~~Paul Rosenzweig, Acting Assistant Secretary, PDEV and Councilor to the Assistant Secretary for Policy~~

FROM: Michael Scardaville, Special Assistant/International Policy Advisor

SUBJECT: Summary of potential changes to seek in the PNR Undertakings

Purpose

Per your request, below is a preliminary summary of areas of the Undertakings DHS may want to consider changing.

Likely Top Priorities:

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Homeland Security

~~June 27, 2006~~ ~~June 26, 2006~~ ~~June 26, 2006~~ ~~June 22, 2006~~ ~~June 22, 2006~~ ~~June 21, 2006~~ ~~June 13, 2006~~

INFORMATION

New Policy Unit
(b5)

MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy

THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and Counselor to the Assistant Secretary for Policy

FROM: Michael Seardaville, Special Assistant/International Policy
Advisor PNR Working Group

SUBJECT: Summary of potential changes to seek in the PNR Undertakings

Purpose

~~Per your request, below is an assessment preliminary summary of areas of the Undertakings DHS should may want to consider changing seek to change in the US-EU PNR arrangement.~~

Summary

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Background

General Some sections of the Undertakings

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Still others require revision to promote greater consistency. Priority concerns are addressed individually below:

Likely Top Priorities:

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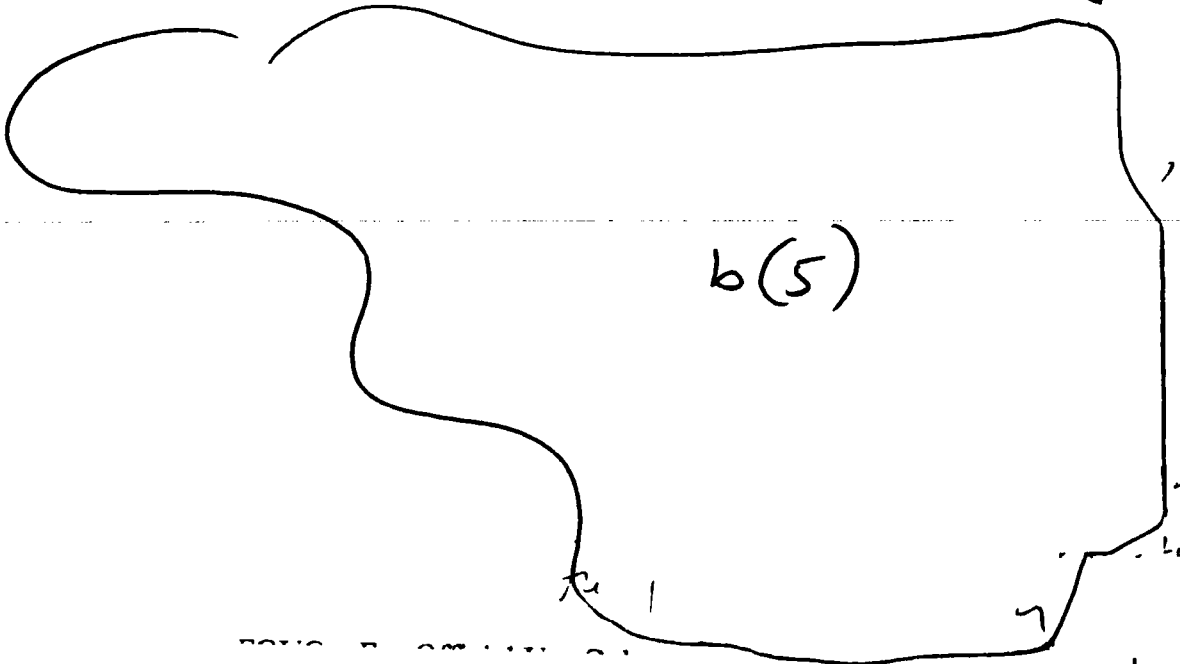
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INFORMATION

Comment [JL1]:

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MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy
THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and
Councilor to the Assistant Secretary for Policy
FROM: PNR Working Group
SUBJECT: Summary of potential changes to seek in the PNR
Undertakings

Purpose

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Background

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Attachment 1: Detailed Assessment of Critical Issues

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July 8, 2006 ~~July 6, 2006~~

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INFORMATION

MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy

THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and
Counselor to the Assistant Secretary for Policy

FROM: PNR Working Group

SUBJECT: Summary of potential changes to seek in the PNR
Undertakings

Purpose

In anticipation of future negotiations with the EU on the PNR arrangement, below is an assessment of areas of the Undertakings DHS should seek to change in the US-EU PNR arrangement.

Background

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Attachment 1: Detailed Assessment of Critical Issues



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INFORMATION

Comment [JL1]: Page. 1

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MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy
THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and
Councilor to the Assistant Secretary for Policy
FROM: PNR Working Group
SUBJECT: Summary of potential changes to seek in the PNR
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Purpose

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Attachment 1: Detailed Assessment of Critical Issues



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Homeland Security

~~July 19, 2006~~ ~~June 21, 2006~~ ~~June 13, 2006~~

INFORMATION

MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy

THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and Councilor to the Assistant Secretary for Policy

FROM: Michael Scardaville, Special Assistant/International Policy
Advisor PNR Working Group

SUBJECT: Summary of potential changes to seek in the PNR Undertakings

Purpose

Per your request, below is an assessment preliminary summary of areas of the Undertakings DHS should ~~may want to consider changing~~ seek to change in the US-EU PNR arrangement. Entering into

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Background

General Some sections of the Undertakings

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addressed individually below:

Priority concerns are

Likely Top Priorities:

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⁶ Undertakings, Articles 5 and 14.

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INFORMATION

MEMORANDUM FOR: Stewart Baker, Assistant Secretary for Policy
THROUGH: Paul Rosenzweig, Acting Assistant Secretary, PDEV and
Councilor to the Assistant Secretary for Policy
FROM: PNR Working Group
SUBJECT: Summary of potential changes to seek in the PNR
Undertakings

Purpose

In anticipation of future negotiations with the EU on the PNR arrangement, below is an assessment of areas of the Undertakings DHS should seek to change in the US-EU PNR arrangement. Overall

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Attachments:

1. Detailed Assessment of Critical Issues
2. List of Sensitive Terms

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Attachment 1: Detailed Assessment of Critical Issues

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Attachment 2

"Sensitive Data"

Codes

Description	Data Field type	Code
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PASSENGER NAME RECORD (PNR) DATA

In early October, the U.S. and the European Union reached an interim agreement on the exchange of airline Passenger Name Record (PNR) data. PNR data is information airlines obtain from travelers making flight reservations, such as the date of ticket reservation, date and place of ticket issue, payment details, passenger/travel agent contact details and travel itinerary. Air carriers flying to the U.S. are required by the Aviation Transportation Security Act to provide U.S. Customs and Border Protection (CBP) with access to PNR data, which CBP uses for law enforcement and terrorist screening of travelers entering the country.

This U.S.-EU interim agreement promotes our joint goal of combating terrorism while respecting our commitment to upholding fundamental rights and freedoms, notably protection of privacy. This interim agreement allows airlines to continue to provide CBP with PNR information about EU citizens in a manner consistent with European privacy laws. The level of privacy protection afforded American and EU citizens remains unchanged. CBP will be able to appropriately share PNR data with other counter-terrorism agencies within the U.S. Government. Sharing will be allowed for the investigation, analysis, and prevention of terrorism and related crimes.

Exchange of PNR data is a sensitive issue with some European parliamentarians, who are concerned that European privacy laws are not being respected. The European Parliament, which had narrowly rejected the previous, 2004 U.S.-EU PNR agreement in a non-binding vote, challenged that 2004 arrangement in two cases before the European Court of Justice (ECJ), one involving European privacy laws, the other concerning the Council's authority to conclude the 2004 agreement. The ECJ issued its ruling in May 2006. Although it did not find that privacy rights were violated, it did conclude that the EU had relied upon an inapplicable legal authority for entering into the PNR arrangement with the U.S. As a result, the 2004 agreement was annulled and the U.S. and EU had to look at the PNR data-sharing issue anew.

The interim PNR agreement expires July 31, 2007. We plan to begin discussions on a new, long-term agreement in early 2007. The European Parliament continues to watch developments closely and receives regular briefings from the European Commission and Presidency on PNR.

Drafted: EUR/ERA:PWalker

11/9/06

Cleared: EUR/ERA:ANardi
L/LEI:KPropp
EB/TRA/OTP:JEmery
INL/PC:LMcKechnie
CA/P:NAngha
FIIR/PGI:IWeinstein

[66] [DOS]
DHS: MScardaville

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L/LEI:KPropp
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INL/PC:LMcKechnie
CA/P:NAngha
EUR/PGI:IWeinstein
[b6]
DHS: MScardaville

[DOS]

[b6]

From: [b6 b2]
Sent: Monday, September 18, 2006 4:48 PM
To: Rosenzweig, Paul [b6] Baker, Stewart; Scardaville, Michael
Subject: RE: Text

[b5]

[b6]
Senior Counsel
Department of Homeland Security
Office of the General Counsel
Washington, D.C. 20528
Fax: [b2]

This communication, along with any attachments, is covered by federal and state law governing electronic communications and may contain confidential and legally privileged information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, use or copying of this message is strictly prohibited. If you have received this in error, please reply immediately to the sender and delete the message. Thank you.

-----Original Message-----

From: Rosenzweig, Paul [b2]
Sent: Monday, September 18, 2006 4:42 PM
To: [b6] Rosenzweig, Paul; Baker, Stewart; Scardaville, Michael
Subject: RE: Text
Importance: High

[b5]

P

Paul Rosenzweig

[b2]

-----Original Message-----

From: [b6 b2]
Sent: Monday, September 18, 2006 4:29 PM
To: Rosenzweig, Paul; Baker, Stewart; Scardaville, Michael; [b6]
Subject: RE: Text

[b5]

[b5]

[b6]

[b6]

Senior Counsel
Department of Homeland Security
Office of the General Counsel
Washington, D.C. 20528

[b2]

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-----Original Message-----

From: Rosenzweig, Paul [b2]
Sent: Monday, September 18, 2006 3:52 PM
To: Baker, Stewart; Scardaville, Michael; [b6]
Subject: RE: Text

[b5]

P

Paul Rosenzweig

[b2]

-----Original Message-----

From: Baker, Stewart
Sent: Monday, September 18, 2006 3:45 PM
To: Scardaville, Michael; Rosenzweig, Paul; [b6]
Subject: FW: Text

I edited this to be more pointed. If [b6] is ok with this, let it go. And please ask [b6] to call me.

-----Original Message-----

From: Rosenzweig, Paul
Sent: Monday, September 18, 2006 3:30 PM
To: Baker, Stewart
Subject: FW: Text

Paul Rosenzweig

[b2]

-----Original Message-----

From: Scardaville, Michael
Sent: Monday, September 18, 2006 3:09 PM
To: Rosenzweig, Paul
Subject: FW: Text

Paul,

[b2]

[b5]

Thanks

[Mike
[b2]]

-----Original Message-----

From: [b6]
Sent: Monday, September 18, 2006 2:33 PM
To: [Scardaville, Michael]
Subject: RE: Text

Mike - C

b5

[b6]
Senior Counsel
Department of Homeland Security
Office of the General Counsel
Washington, D.C. 20528

Fax: [b2]

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-----Original Message-----

From: [Scardaville, Michael]
Sent: Monday, September 18, 2006 1:37 PM
To: [b6]
Subject: RE: Text

Now you don't want to go and make more work for yourself, do you?

[Mike
[b2]]

-----Original Message-----

From: [b6]
Sent: Monday, September 18, 2006 1:37 PM
To: [Scardaville, Michael]
Subject: RE: Text

Duh - completely forgot I'd done this. Let me look up [b5]

[b6]
Senior Counsel

Department of Homeland Security
Office of the General Counsel
Washington, D.C. 20528

Fax: [b2]

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-----Original Message-----

From: [Scardaville, Michael]
Sent: Monday, September 18, 2006 1:31 PM
To: [b6]
Subject: RE: Text

Here you go.

[Mike]

-----Original Message-----

From: [b6]
Sent: Monday, September 18, 2006 1:30 PM
To: [Scardaville, Michael]
Subject: RE: Text

Do you have that in one of the memos and if so can you chop it out and I'll take a look at it to see if it fills the bill? I know I've written this at some point but can't remember exactly when/where. Thx, [b6]

[b6]
Senior Counsel
Department of Homeland Security
Office of the General Counsel
Washington, D.C. 20528

Fax: [b2]

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-----Original Message-----

From: [Scardaville, Michael]
Sent: Monday, September 18, 2006 1:07 PM
To: [b6]
Subject: RE: Text

OK, can we just use what you produced in July?

[Mike]

-----Original Message-----

From: [b6]
Sent: Monday, September 18, 2006 1:04 PM
To: [Scardaville, Michael]
Subject: Fw: Text

[Mike] will put together something [b 5]
PLCY. [b6]

----- Original Message -----

From: [b6 b6 b2 DOS
To: [b6 b2]
Cc: [b2]
Cc: [b6 b2 DOS]
Sent: Mon Sep 18 12:40:13 2006
Subject: Text

] Scardaville, Michael]

[b6]

[b5 DOS]

Regards,

[b6] DOS