



- Air Carriers will likely be unable to comply with Secure Flight within the short timeframe suggested, given program mandates for AQQ and ESTA (and other International Data Exchange Programs).
- Carriers have been unable to start programming for Secure Flight pending the Final Rule as requirements are not fully understood. Even 180 days from Final Rule will not be realistic for most carriers.
- Airlines need clarity of rollout plans for domestic vs. international Secure Flight components.
- Secure Flight data requirements must be completely in line with AQQ for international flights, including sequence numbers, transaction references etc. The Consolidated User Guide (CUG) contains some inconsistencies in this regard. This must be one single data feed to DHS, not two different programs listed in one document and called "consolidated."
- Additional data provision of name, DOB and gender to Secure Flight at minus 72 hrs should not be mandatory if an airline is already providing PNR data at that point, since this is a duplicative requirement.
- There must be one vetting result and one vetting result only from AQQ, Secure Flight and ESTA.
- Outage requirements must be more fully worked through - there needs to be a reasonable fallback position, we can not simply shut down check in if DHS systems, airline systems or networks fail.
- Extraterritorial requirements such as boarding pass printing inhibitions and sterile area entry requirements will negatively affect passenger travel.