November 8, 2017

The Honorable John Thune
Chairman
U.S. Senate Committee on Commerce, Science
and Transportation
512 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Nelson
Ranking Member
U.S. Senate Committee on Commerce, Science
and Transportation
716 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Thune and Ranking Member Nelson:

I am writing on behalf of the Security Industry Association (SIA) and its nearly 800 member companies that develop, manufacture and integrate security solutions as well as employ thousands of technology leaders. Our industry, with its in-depth knowledge and expertise in deploying security solutions, plays a key role in helping the U.S. Department of Homeland Security and its component agencies fulfill their missions, as well as protecting our nation's critical infrastructure.

We are concerned with a provision included in S. 1872, the TSA Modernization Act, which we believe would diminish security provided by the Transportation Security Administration's popular PreCheck program. Specifically, the minimum capability requirements laid out in Section 231 (c) states that *"At least 1 agreement under subsection (b) shall include the following capabilities: (1) Start-to-finish secure online or mobile enrollment capability. ''(2) Vetting of an applicant by means **other than biometrics** . . ."* subject to several qualifications for non-biometric vetting.

We agree with the goal of expanding participation in the PreCheck program, and understand efforts in the bill to achieve this by adding enrollment options for the public. However, this provision would completely remove use of fingerprint background checks from consideration as a vetting tool for millions of new enrollees creating a troubling security shortfall. Instead, the provision calls for non-biometric vetting methods, which would include biographic checking tools like name check, commercial data review and knowledge-based authentication.

While such methods can provide unique capabilities for use in the public and private sectors, biometric-based vetting eliminates several vulnerabilities that are inherent in biographic checks. TSA PreCheck is critical to homeland security and the safety of the traveling public. There is no equally secure nor reliably accurate substitute for fingerprint background checks. Importantly, there is no nationwide commercial database that has access to all criminal information except the FBI database, which contains biometric records (fingerprints) spanning many decades.

Threats to aviation security are as great today as they were prior to the 9/11 attacks. We urge the Committee not to reduce the amount of information TSA needs to make a proper threat assessment of program applicants, and consider alternative ways to increase enrollment.

Thank you for your leadership on the issue of ensuring that TSA has the policy guidance and resources necessary to help our skies safe. SIA and our members stand ready to work with you and your colleagues on this important issue as the Senate considers the TSA Modernization Act. Thank you for your consideration.

Sincerely,

Don Erickson
CEO
Security Industry Association