APIS Frequently Asked Questions

Customs and Border Protection has created the following document in response to some of the airline industry's frequently asked questions. This document will be updated throughout the process to address additional questions that arise during testing.

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Operational Questions

APIS Pre-Departure Final Rule

1. What is the date of implementation for the APIS Pre-Departure Final Rule requirements?

Answer: The date of implemention for the APIS Pre-Departure Final Rule requirements is February 19, 2008.

2. For non-US flagship carriers, does the APIS final rule apply for all flights into/from the US?

Answer: All commercial carriers, into and out of the United States, are required to transmit the appropriate APIS data, at the times indicated in the APIS Pre-Departure Final Rule.

3. Is there a change to Crew APIS processing within the final rule for air carriers?

Answer: There were no changes to the current Crew APIS transmission requirements in the APIS Pre-Departure Final Rule.

4. Will the APIS Final Rule be required for flights that over fly the U.S., where a carrier does not actually land but flies over the continental U.S. or the territorial waters of the continental U.S.?

Answer
The CBP APIS Pre Departure Final Rule did not change the requirements for over flights. Under the APIS Final Rule of 2005, CBP required carriers to transmit crew information for any flights over flying the U.S. They did not change that under the Pre Departure Final Rule. Under the SF NPRM, they proposed adding requirements for passenger information for over flights. This is still open as part of the SF comment period.

Timing of Transmissions

1. Is it OK to send interactive batch APIS transmissions for passengers who have APIS data in their Passenger Reservation Data (PRD) but are NOT "checked in" yet? Understanding, that we would send an updated message if any changed/different data at time of airport check-in. Additionally, can this message be sent in addition to the interactive individual message?

Answer: Passenger data can be submitted and a screening response will be returned for passengers who have not already checked in for the flight. Complete APIS data for each passenger is required no later than 30 minutes prior to securing of the aircraft for batch submissions and no later than up to securing of the aircraft for

APIS Quick Query (AQQ) submissions. Carriers are encouraged to develop batch interactive and AQQ capabilities.

2. Why is there a restriction on issuing boarding passes prior to -24 hours? If we pass APIS at -36 hours and the response is cleared or a selectee, why can't we print the boarding pass at that time?

Answer: Although carriers are encouraged to transmit data earlier in the process, the CBP APIS Pre-Departure Final Rule requirement does not change any restrictions on issuing boarding passes prior to the -24 hour timeframe. Currently there is an Emergency Amendment (EA) issued by TSA stating aircraft operators are prohibited from issuing boarding cards more than 24-hours prior to flight time. Please refer to EA 1546-01-18E SELECTEE INTERNATIONAL dated 7-8-04.doc

3. A combination of batch and AQQ is allowed. Is there total flexibility regarding the timing of the switch from batch to AQQ? E.g. Could a carrier send a batch manifest at -6 hours and then switch to AQQ after that or can the AQQ only take place after -30 mins batch manifest?

Answer: A combination of batch and AQQ submissions is allowed. Complete APIS data for each passenger is required no later than 30 minutes prior to securing of the aircraft for batch submissions and no later than up to securing of the aircraft for APIS Quick Query (AQQ) submissions. Carriers are encouraged to develop batch interactive and AQQ capabilities. Switching from one transmission method to another is at the discretion of the aircraft operator.

4. If a batch manifest is opted for and no boarding passes can be issued until the vetting response comes back from DHS, will we have to wait until -30 and then print the boarding passes?

Answer: The submission of a batch manifest is a "No Later Than" timing event and provides flexibility for carriers operational processes. A carrier can send a batch manifest much earlier, and carriers are encouraged to send data 72 hours prior to the flight when available. If a traveler provides complete APIS data at 72-hours prior to the flight, the carrier can submit complete APIS data at that time. If the traveler provides limited data such as a name and date of birth only, the carrier can still send that data at 72-hours and receive a screening response. Complete APIS data must still be provided, for a batch submission, "No Later Than" 30 minutes prior to securing of the aircraft doors.

5. Flights from UK to USA are subject to a TSA EA which requires final APIS at -15 Push Back. Does the Final Rule override the current TSA requirement for UK-USA flights?

Answer: The CBP APIS Pre-Departure Final Rule requires complete APIS data for each passenger is required no later than 30 minutes prior to securing of the aircraft for batch submissions and no later than up to securing of the aircraft for APIS Quick Query (AQQ) submissions, for all flights.

6. If carriers transmit their batch manifest data 30 minutes prior to departure and are cleared before the 30 minutes are they ok to leave? If so, is this in writing anywhere?

Answer: This accommodation is established as part of the APIS Pre-Departure Final Rule, published in the Federal Register, August 23, 2007, page 48324, (b) Connecting Passengers, states, "Finally, where the interactive batch transmission option is employed and connecting passengers with boarding passes arrive at the gate (or other suitable location) within the 30-minute window, the carrier is not required to wait 30 minutes from the time the data is transmitted to secure the aircraft and depart, provided that appropriate vetting results are received, and validation occurs, before any connecting passenger is boarded."

7. If a batch of most of the passengers is sent before the 30 minute deadline, what are carriers to do with the passengers waiting?

Answer: Complete APIS data for each passenger is required no later than 30 minutes prior to securing of the aircraft for batch submissions and no later than up to securing of the aircraft for APIS Quick Query (AQQ) submissions. Carriers are encouraged to develop batch interactive and AQQ capabilities. If a carrier has not developed AQQ functionality and they have less than 30 minutes before the scheduled time of securing the aircraft, the carrier is still obligated to submit APIS data for all passengers on the flight and wait for a boarding pass authorization, which may take up to 30 minutes to process and return a boarding pass result.

8. If the carriers can't comply by 2/08 would CBP be able to complete watchlist vetting if all carriers closed flights at -30 and what would be the expected time response from CBP?

Answer: The CBP system currently has the functionality to conduct watchlist screening of passenger APIS transmissions submitted no later than 30 minutes prior to securing the aircraft. Under most circumstances, the CBP system processes transmissions in a matter of minutes and will have the ability to provide a screening response within minutes of receipt of the message.

9. If a carrier is unable to do Interactive AQQ, will the carrier be required to submit APIS-30?

Answer: The way the rule is written, as of 19FEB08, carriers would be required to submit data 30 minutes prior to the securing the aircraft doors. As part of your

implementation plan, you should indicate how you could achieve that. CBP doesn't have any indication on whether that date will remain fixed or if an extension would be granted. The way the rule is written today it does state that you must submit 30 minutes prior to departure.

10. Can DHS be more specific with regards to the statement within the regulation related to the amount of time it will take to respond to an interactive message ('seconds') and a batch interactive message ('a minute or two') response time?

Answer: For carriers using the APIS Quick Query (AQQ) transmission method, DHS will provide a response within 4 seconds of receipt of transmissions containing 10 names or less. For the batch interactive transmisisons method, DHS will provide a response within 30 minutes. The 4 seconds is based on the amount of time it will take the CBP system to process the message internally and provide a vetting response. The 4 seconds does not take into consideration the latency involved in the delivery of the message from the carrier to CBP or the latency involved in returning the message to the carrier from the CBP process.

11. Air carriers are already transmitting PNR data at intervals of 72 hours, 48 hours and 24 hours prior to departure. Why is this information not used for vetting? While presently the Unique Identifier Number and Date of Birth are not datafields of the PNR, one may change the PNR structure accordingly. Would this be a possible alternative?

Answer: The format that PNR data is transmitted is different than the international standard used to meet the APIS requirements. In order for the message to be processed and meet APIS requirements, the message would need to be in the recognized UN/EDIFACT format. Once that is accomplished, the 72, 48 and 24 hour transmissions would be received and processed for vetting.

12. Pg 33/66 Table 7 of the Consolidated User Guide references the Transmission Triggers. One line references APIS data submission but should there be multiple references to the timing triggers because it would differ if carriers use the non-interactive batch option, the interactive batch, or the interactive individual option?

Answer: The discussion of data submission provided in the Consolidated User Guide is a point of reference. When submitting APIS data, all data must be submitted prior to securing of the aircraft doors.

13. APIS-30: Is there any requirement that states that the Passenger Manifest cannot be sent more than 30 minutes before departure? One solution is to set up transmittal to automatically generate 30 minutes prior to scheduled departure (if the flight delays, we've sent it at least 30 minutes prior to departure).

Answer: The APIS Pre-Departure Final Rule indicates the submission must be "no later than" 30 minutes prior to departure. Therefore, the message can be transmitted well in advance of the 30-minute time frame.

14. Carriers that intend to do the batch process may not have all APIS data until the passenger arrives at the airport, so will they be unable to print the boarding pass until the passenger is cleared?

Answer: An exemption has been made for connecting passengers. Connecting passengers boarding passes can be printed prior to submitting APIS data. The batch process is a part of the Secure Flight Notice of Proposed Rule Making. Carriers choosing to not utilize the batch option, for international transactions, will eventually need to develop some sort of batch submission process to meet what ends up being published in the Secure Flight final rule. Full and complete APIS data is not needed to achieve the authorization to print a boarding pass. Full name and date of birth are all that is needed to achieve a vetting response for an individual holding an international itinerary. Carriers developing the ability to acquire full name and date of birth, prior to an individual arriving at the airport would be able to send a batch manifest of those names, receive boarding pass printing authorization and could then send a subsequent message containing full and complete APIS data prior to the traveler gaining access to their intended aircraft.

15. Can ITCI connection boarding passes be issued, both inbound and outbound U.S., without an AQQ result?

Answer: Yes, connecting passengers are not required to have APIS submissions before printing their boarding passes. If the passenger is a selectee and they are behind the security check point, they still have to go through the selectee process as established by the TSA.

16. In the case where some carriers utilize the interactive batch, how will CBP respond? Will that be one message per passenger like in an unsolicited CUSRES message?

Answer: CBP allows from 1 to 999 names within a batch transmission. CBP will respond back with a single message with a Yes or No for each passenger within the message. It is critical that carriers uniquely identify each passenger within the message they send. The guidelines state that unique identifiers for passengers include either PNR Locator or a Unique Identifier / Sequence Type Number. If the PNR Locator doesn't uniquely identify each passenger in the PNR, then a sequence type number needs to be used. CBP creates a CUSRES response and will echo back pertinent information so the carrier can reconcile it to the initial transmission. The Unique Identifier will be echoed back with an indicator that the passenger is cleared, selectee, inhibited or an error occurred.

17. One issue that has been raised by some carriers is transmitting data at 72 hours out, is this a CBP requirement?

Answer: For CBP APIS Pre Departure Final Rule carriers are required to submit data 30 minutes prior to securing aircraft doors for batch transmissions and up to time of securing the aircraft doors for AQQ messages. For APIS Pre Departure, CBP is encouraging carriers to transmit data as early as possible and up to 72 hours out. It is not a requirement under the CBP APIS Pre Departure Final Rule.

The 72 hour requirement is a part of the TSA Secure Flight Notice of Proposed Rule Making.

18. When a carrier sends an AQQ request does the carrier specify if it is an initial request or if it is a second or third request for a passenger? Does that mean the carrier won't be able to send one request for two passengers, where it is the first request for one passenger and the second or third request for the other passenger? This could happen if the carrier checks in a passenger and sends the request and the passenger ends up being cancelled. Then later he checks in again, with a travel partner. Is it possible to accommodate this?

Answer: In the Consolidated User Guide, there is a discussion of sequencing of transmissions. So if partial data is provided in the initial transmission and a subsequent transmission is provide, an increase in the message sequence would indicate such. In the CUSRES message returned by CBP, this sequence would be echoed back to the sender.

The use of the Transaction Reference Number and the associated message sequence number within the context of the RFF segment, is to satisfy TSA Secure Flight requirements. It is not necessary for meeting CBP requirements. If you send a name multiple times, the latest information provided will be used for vetting and APIS sufficiency evaluation.

As long as you are using the same unique identifier, every time you submit a record, CBP will send you back a vetting result. Under most circumstances that vetting result should be the same.

APIS Pre Departure looked at this in two aspects. First, there is a requirement to receive a DHS vetting result in order to get the individual on the plane. Second, there is the APIS compliancy. If the carrier sends CBP a message in order to get a vetting result, CBP doesn't care if it is the first time they've seen the person or if it's the third or fourth change to that individual. You can mix the passengers together within the same message.

19. Will there be a requirement to do screening at time of booking to help alleviate some of the last minute outages that may occur?

Answer: CBP encourages transmission of data up to -72 hours before departure. TSA SF NPRM also encourages this. Carriers believe that data collected prior to that will not be accurate and there may be too many changes beyond the 72 hours.

APIS Data Elements

1. The Guide states that the values for all UNA sub-items will <u>always</u> be as stated. Our understating (and actual current use) of this element is that the carrier can specify their own separator characters. For UA we currently use an 'open parenthesis' instead of the 'plus sign' for the Data Element Separator (UNA2). Also we currently use a 'dollar sign' instead of a 'single quote' for the Segment Terminator (UNA6). Will UA be allowed to continue the use of their current optional values? Will DHS only send back to the carrier the UNA stated values that appear in the guide? Why do the examples in the Guide show an 'asterisk' for the 'space' separator character? *(Note: Page 51 Section 4: states that a different set of control characters may be specified in the UNA).*

Answer: The section you are referring to was extracted directly from the WCO/IATA dictionary for UN/EDIFACT coding. As stated in previous versions of the UN/EDIFACT Implementation guide, CBP will support carrier's versions of the UNA segment identifiers and will return messages based on the identifiers provided. Clarification will be made to the UN/EDIFACT PAXLST Implementation guide, in this particular section

2. The Transaction Reference Number (TRN) is presented as conditional, and is "Used at the discretion of the aircraft operator to manage messages." We assume this applies to the appended, Message Sequence Number (MSN) as well. What issues if any, does DHS foresee if the carrier chooses to <u>not</u> use the TRN + MSN elements in their AQQ messages?

Answer: As is with a number of Conditional fields, they are identified as Conditional in the UN/EDIFACT dictionary of data elements. Due to their purpose and use, they can be considered Mandatory. In addition, CBP and Secure Flight will be utilizing the TRN and MSN elements for auditing and message management purposes. Therefore, the TRN and MSN elements should be considered mandatory and the carriers need to incorporate them in their message structure.

3. Please explain the difference between APIS data elements and PNR data elements? (Table 3 & 4 of the Consolidated User Guide) Are we only sending APIS data elements via AQQ? If yes, when/how are the PNR data elements sent, or are they?

Answer: The APIS Final Rule of 2005 established the data elements required as part of an APIS transmission and carriers often submit APIS data from their Departure Control System (DCS). The CBP APIS Pre-Departure Final Rule establishes transmission methods and time requirements for commercial carriers transmitting APIS data for travelers arriving into or departing from the United

States. Passenger Name Record (PNR) information found in a carriers' reservation system is separate from and not mandatory as part of the APIS Pre-Departure Final Rule. The PNR data element listing in the Consolidated User Guide is provided as part of one of several message examples.

4. Full name is defined as first and last. Yet, page 10 of the Consolidated User Guide states middle is mandatory if available. Can you please clarify the definition of "Full Name"?

Answer: The APIS Final Rule of 2005, establishes full name as; last, first, and, if available, middle. Full name can often be obtained by swiping the Machine Readable Zone of the DHS approved travel document.

5. Full name is defined as it appears on the travel document. Does CBP compare the full name to the actual PNR and boarding pass?

Answer: The carrier is required to submit the APIS data found in the individuals DHS approved travel document, this often occurs through swiping the Machine Readable Zone (MRZ). While CBP does not compare the full name to the PNR or boarding pass, CBP does compare data found in the DHS-approved travel document with the APIS record.

6. Passport and address details are in most cases not known until a short time before departure (during check-in process). What is the minimum information that must be sent to receive a vetting response?

Answer: For international transmissions, the minimum data required to receive a screening response is, full name and date of birth. Full name is based on a last name of at least one character, not containing special characters other than a hyphen (-) or an apostrophe ('), a first name of at least one character, not containing special characters other than a hyphen (-) or an apostrophe ('). Date of birth containing a valid month, day and year.

7. What is meant by 'inadequate' data?

Answer: In order to properly screen a traveler on an international flight, a minimum of full name and date of birth are required. Please refer to the description of full name and date of birth, as answered in a previous question.

8. Is CBP working with IATA to develop standard messages to support the collection of the additional elements proposed for Secure Flight?

Answer: CBP has identified what is believed to be data elements not currently accepted in the UN/EDIFACT PAXLST format dictionary. Once we have identified the final new data elements expected in a Secure Flight transmission, CBP will work with the WCO/IATA counsel to achieve acceptance.

9. Pg 26 of the Consolidated User Guide - Various Doc Type Codes Section 4.2.1 and 4.2.2 - PNR Data Elements, these two tables appear out of sync. One lists F for Facilitation Document, and the other lists F as Deportee/Consular Letter. Are all temporary travel docs/parole letter/single journey letters defined as doc type F?

Answer: As of October 1, 2007, the only acceptable 'F' type documents will be deportees or travelers with consular letters.

10. Pg 28 of the Consolidated User Guide - 4.2.2 PNR Data Elements Table - references US destination Address twice - Once as a mandatory element, and one as not mandatory. Which is it?

Answer: The Consolidated User Guide will be updated to reflect address APIS transmission requirements for visitors.

11. Pg 44/66 of the Consolidated User Guide - The receipt of an error message due to invalid data submissions would prevent boarding of a passenger. Does this mean we can issue a boarding pass for an error condition provided we restrict/catch at boarding? Or that a boarding pass can not be issued for an error condition? There is inferred reference that the error is considered a not-cleared, is that the same as inhibited? What constitutes 'invalid data?'

Answer: An error message means that a boarding pass cannot be issued, as the data is deficient to conduct an adequate screening. Invalid data is considered, but not limited to, no date of birth for an international traveler, invalid date of birth, no last name provided or no first name provided.

12. Section 4.9.34 of the Consolidated User Guide - Error response when you fail business rule edits, what specifically are the edits that will generate an error response? Please provide a comprehensive list.

Answer: An error response is based on the following comprehensive list of rule edits for international flight transmissions:
Missing last name
Missing first name
Missing date of birth
Invalid last name – characters other than alpha, hyphen (-) or apostrophe (')
Invalid first name – characters other than alpha, hyphen (-) or apostrophe (')
Invalid date of birth
Error messages returned are not a part of the APIS sufficiency rate.

13. For AQQ qualified vs. informational data for a vetting response. For Secure Flight is full name the only data element required? This would be a difference between what is written and indicated in table 9.

Answer: Table 9 refers to Secure Flight requirements. In order to receive a vetting response for an international transmission, a minimum of full name and date of birth are required.

14. Can we use Type B headers for transmission of data?

Answer: Yes, CBP will save and reuse the header in its response back to the air carriers.

15. Regarding the Clear Passenger Request on Page 68/69 of the UN/EDIFACT Implementation Guide (BGM type 745):
   What is a Clear Passenger Request?
   When would it be used?
   What would trigger this message type? Note: we would need an example of this type of message
   Should this type message be able to be done by Feb. 19?

Answer: A Clear Passenger Request is used to submit passenger APIS data (partial or complete) and request authorization to issue a boarding pass. This type of message is expected for the February 19, 2008 date.

16. Regarding Cancel Reservation/PNR on Page 68/69 of the UN/EDIFACT Implementation Guide (BGM type 745, Document ID – XR with example on Page 202, B.14. Cancelled Reservation):
   When would this message be used?
   What would trigger this message type?
   Should this type of message be able to be done by Feb. 19?

Answer: The Cancel Reservation/PNR is primarily a Secure Flight proposed requirement. However, it can also be used for APIS submissions, e.g. an APIS submission has been provided and the traveler subsequently does not travel. Normally, for international transmissions, this would be accomplished in a Flight Close-Out message; however, a carrier may choose to use the Cancel Reservation/PNR option when maintaining APIS records. It is not expected for February 19, 2008, as the carrier will most likely accomplish it through a flight close-out message.

17. Regarding Cancel Flight on Page 68/69 of the UN/EDIFACT Implementation Guide (BGM type 266 Document ID – XF with example on page 206 B.16. Cancelled Flight):
   Will we be doing the cancel flight type message?
   What would trigger this message type?
   What about leg cancel – will there by anything different for a leg cancel as opposed to a flight cancel?
   What about when flight (leg) cancellation is rescinded?
   Should this type message be able to be done by Feb. 19?

Answer: Cancel Flight was created at the request of the carrier industry. Often, a flight will be cancelled and, since numerous names will already have been submitted for APIS and boarding pass authorization, carriers asked if there would be a way of submitting a single message indicating a flight was cancelled. The Cancel Flight message is for the information associated with the international leg of a particular flight; therefore if the leg cancellation is associated with the international leg, the message would be a flight cancellation message. If a flight cancellation has been submitted and the cancellation is rescinded, the carrier will need to re-submit a complete APIS manifest. The flight cancellation function will not be required by the February 19, 2008 date.

18. In reference to the requirement of full/complete APIS no later than 30 minutes prior to departure and/or up to door close: Does this mean that all APIS data elements (including the US Destination Address, when applicable) are required no later than 30 minutes prior to door close or just the MRZ APIS data fields? Or does this mean just the data required for vetting purposes, and that, in actuality, a carrier could follow-up with a final APIS transmission to CBP upon flight close?

Answer: As stated in the APIS Pre-Departure Final Rule, full and complete APIS data must be received prior to securing of the aircraft doors. Full and complete APIS data is based on the information required under the APIS Final Rule. That data includes the following data fields:
    Last name
    First name
    Middle name (if available)
    Valid date of birth
    Gender
    Document type
    Document number
    Document country of issuance
    Document expiration date
    Country of citizenship/nationality
    Country of residence (arrival only)
    Address while in the United States (arrival only, visiting foreign nationals)

19. Is the APIS-30 pre-departure manifest the same message we send today, which does not include the unique passenger ID?

Answer: Generally speaking, the message submitted by carriers today is the APIS non-interactive batch message. In order to meet the APIS interactive batch message, there are changes to the message format, specifically in the UNB segment.

20. Can both the pre-departure manifest and the Flight Close-Out message be sent using teletype until we have the MQ with AQQ?

Answer: Yes, pre-departure transmissions and Flight Close-Out messages can be sent using a telex address.

21. The Consolidated User Guide states AQQ must use UN/EDIFACT and Secure Flight must use UN/EDIFACT or XML. Other places in the Consolidated User Guide reference DHS in conjunction with UN/EDIFACT or XML. Another area says AQQ will only accept UN/EDIFACT and SF will accept either. Will CBP accept XML?

Answer: XML is an option for purely domestic transactions. CBP will **not** accept XML formatted messages for international transactions.

22. How do the requirements differ between full and complete APIS and boarding pass requests?

Answer: In order to receive a boarding pass printing result all that is needed is full name and date of birth. Providing this information does not meet APIS submission requirements. Carriers choosing to submit full name and date of birth to receive a boarding pass printing result will still need to provide full and complete APIS data, prior to securing of the aircraft doors.

23. We don't currently print boarding passes for infants with no seat and an infant name field is not required. Can we add the word INFANT to the adult unique reference ID if traveling with an infant so both passengers have a unique reference number?

Answer: APIS data is required for all passenger's onboard international flights. What is provided in the unique reference for the infant is a carrier decision, as long as it meets data field limitations.

24. Is it correct that CBP will not be sending a verification code that carriers will store in their system?

Answer: Under the APIS Pre Departure Final Rule, CBP is not changing the requirement to validate data. Under the APIS Final Rule of 2005, carriers were required to validate each passengers travel documents with the information that they submit through the APIS transmission compared to the person traveling. The carrier is required to validate data for every passenger on an international flight.

Unique Identifiers

1. Does the airline assign the Passenger Reference Number or does DHS assign this number?

Answer: The Passenger Reference Number is assigned by the aircraft operator.

2. How does CPB/DHS view the 'life' of the carrier-created unique identifier? Will CBP/DHS attempt to use this for 'the life of the PNR'? If a passenger becomes an

AQQ-selectee on their outbound, DEN-YVR trip, does your process want to know that this same passenger (based on the RFF values supplied by the carrier) on his return trip, is the same guy that was a Selectee two days previous on the outbound trip?

Answer: CBP views the unique passenger ID for the life of the directional travel. In the above example, the selectee response is to be used for the departure transmission of DEN/YVR. When the traveler returns, the carrier is expected to submit another clear passenger request, with a new boarding pass authorization result.

3. Consolidated User Guide v1.0 Part 1, pg 42, Table 11 (APIS Data Submission Rules) indicates that the PNR never changes. In fact the record locator can change in various situations. Should this change to "informational" instead of "never changes"? For example: a party of two are in the same PNR, they both check-in and get a cleared boarding pass printing result; we then divide the record for some reason and passenger 2 gets a new record locator, but is still cleared because the original boarding pass is still valid.

Answer: If the carrier chooses to use the PNR as the single indicator of reference to a traveler, the carrier cannot change the PNR due to the fact the DHS system will see a second PNR as a new traveler. If the carrier and carrier system provides the PNR and Unique Identifier in the submission, the change of PNR will be received and can be seen as an informational update.

4. With AQQ/Secure Flight requiring unique PaxID, if a carrier were to send the same passport info for two individuals in a PNR, how exactly would CBP/Secure Flight handle?

Answer: For an international transaction, the AQQ process will process the information and determine if the name, date of birth and document number are associated with a record found on a watchlist.

5. **Does the Unique Identifier need to be different between an Infant Passenger and the Adult?**

Answer: APIS is required for all passengers. To get a response back, CBP needs a Full Name and DOB. Each passenger should have a separate identifier.

If the Adult and Infant have the same unique identifier (Infant on lap) and the vetting result is selectee or inhibited the response for both passengers will be selectee or inhibited, guilty by association.

Bottom-line, a separate unique identifier is needed for an infant passenger and an adult. APIS has always required date for all souls on board. This requirement has not changed.

6. **Should a unique identifier be sent with different sequence numbers, where the passenger would have a different sequence number based on a ssegment?**

Answer: The intent of unique identifier is to maintain the identifier for that passenger for the direction of travel. If you increment the unique identifier, CBP would see that as a brand new passenger in their system. Incrementing a passenger is not necessary, when the passenger has multiple legs within their travel.

In earlier discussions with the industry, an example of using the sequence number was provided, however, it was intended as an example only. It is the carriers' discretion to determine the unique identifier. A traveler moving from LHR/JFK/ATL should only have one unique identifier. In addition, a traveler moving from LHR/JFK/ATL/MEX should only have one unique identifier. Two separate APIS submissions are required, however the use of the same unique identifier will not hamper the processing of the individual data received for the traveler.

7. **Is the Unique Identifier based on flight number? If you have a connecting passenger, would they be using the same Unique Identifer for both flights?**

Answer: The unique identifier is by passenger and not by flight. CBP recognizes that two carriers that codeshare may have different identifiers for the same passenger. When CBP sends back a cleared or inhibited message it will always be based on the unique identifier provided. CBP sends that information over to APIS for APIS compliance.

Passengers holding connections should have the same unique identifier, throughout their single direction travel. When the traveler is connecting with multiple carriers, use of the unique identifier should be maintained. If the unique identifier is not maintained, carriers run the risk of receiving conflicting vetting response, therefore causing confusion and uncertainty to the handling of the traveler. It is strongly suggested carrier alliances work together when transmitting data to DHS, so that conflicting vetting results are avoided. The best way to do that is to use the same unique identifier for a single traveler on multiple carriers.

8. **With the Unique Identifier the the carrier sends to CBP, will CBP add to that idenfier so that it comes back larger than what was originally sent?**

Answer: No, CBP will not change the Unique Identifier sent by the airline. Uniqueness is maintained by the carrier code, flight number and date of arrival or departure. The handling of a unique identifier must be understood as necessary when applying proposed Secure Flight requirements. When a system has multiple records for a single individual, there is the risk of conflicting vetting results or an impact on the proficiency of the system process.

Based on what is in the Secure Flight Notice of Proposed Rule making, carriers are expected to maintain the same unique identifier for an individuals single direction travel.

9. Can an airline assign the same unique identifier to two different passengers, as long as they are on different flights, different dates, etc?

Answer: Yes, that is possible. Unique Identifier is based on Carrier code, flight number and date of travel.

10. Are Unique Identifiers pre-assigned or do airlines make them up?

Answer: Airlines are to create Unique Identifiers at their own discretion. CBP will not make recommendations on how you assign unique identifiers. There are limitations within UN/EDIFACT syntax guidelines and that is what the airline has to comply with.

Do not use special characters within the Unique Identifier. Only alpha/numeric characters should be used.

Updates to APIS Transmissions

1. If a passenger checked in and was cleared for one flight to the US, and the passenger is moved to another flight because the flight is full, should the aircraft operator send a cancel reservation (BGM XR), and then a new AQQ request for the new flight?

Answer: Passengers that are reported on one flight and for various reasons do not fly, will be identified through either the Flight Close-Out message or the cancel reservation submission. Since an APIS submission is required for each commercial flight arriving into or departing from the United States, the passenger data must be submitted as part of the new flight.

2. Would a Change Passenger Data submission (as defined in Table 11 of the Consolidated User Guide for qualified vs. unqualified changes) be all that is required for a cleared passenger rebooked on another flight? Or do we need to develop the capability to send a Change Flight message for February 19, 2008?

Answer: The Change Passenger Data submission is a Secure Flight proposed requirement and is not expected for the February 19, 2008 date. APIS data is required for all travelers on a flight crossing international borders. Therefore, a passenger rebooked onto another flight would require a re-submission of APIS data, to indicate the passengers new flight information.

3. Is it possible to move several passengers from one flight, by using a single submission that shows the original flight, followed by the new flight?

Answer: The international UN/EDIFACT transmission standard employed by CBP does not support a message transaction to move passengers from one flight to

another. Under the current APIS Pre-Departure process, a carrier can submit a list of passengers on a flight, if these passengers cancel from their original flight; their status will be identified through the Flight Close-Out message or by sending a cancelled flight message.

4. The Consolidated User Guide indicates that itinerary is a "qualified" category. How does CBP expect this to work on standby and non-revenue customers? The customer's itinerary could change numerous times within a day.

Answer: Passengers that are reported on one flight and for various reasons do not fly, will be identified through the Flight Close-Out message or the cancel reservation submission. Passengers traveling on multiple international flights, within a given day, will require separate APIS transmissions for each flight. Since an APIS submission is required for each commercial flight arriving into or departing from the United States, the passenger data must be submitted for each new flight.

5. When there is an unscheduled extra-stop after the passenger has departed, or a diversion enroute, do we need to inform the government via a passenger update message?

Answer: Under the initial stages, unscheduled stops, that do not afford the ability for a passenger to de-plane, will not require a re-transmission. It is possible this will change, based on the final determination of the Secure Flight rule.

6. Can we retain the original vetting indicator if a passsenger is rebooked for a flight on the same day, to the same destination, if the PNR address changes, or if the flight was delayed into the next day?

Answer: Under the APIS Pre-Departure Final Rule requirements, an individual that is rebooked on to another flight would require a new APIS transmission. That new APIS transmission will initiate a new screening response from the CBP system.

7. If a flight is delayed for its arrival or departure and the new time is a different date, does the carrier have to submit a new APIS manifest for each passengers?

Answer: Whenever an international flight departure from or arrival in to the United States changes dates it requires a complete re-submission of data for travelers.

8. Consolidated User Guide page 59, Section 5.3.3 Data Validation – Please confirm that a message validating the data does not have to be sent for AQQ, only Secure Flight.

Answer: Section 5.3.3 of the Consolidated User Guide has a CBP-specific response which states that carriers are required to validate data previously submitted with

that being presented by the traveler. In accordance with the APIS Pre-Departure Final Rule published August 23, 2007, validation must be done prior to the traveler gaining access to their intended aircraft. If the data provided matches that which was previously submitted for APIS compliance, then a subsequent message is not required.

APIS Batch

1. What is APIS batch? Is APIS batch intended to send message over TTY or MQ?

Answer: APIS batch is generally what carriers are providing today. Non-interactive batch is an asynchronous message. It can be sent over either TTY or MQ.

2. What is APIS Interactive Batch?

Answer: APIS Interactive batch is the same batch message sent today, with a change in the UNB segment indicating the carrier is expecting an answer.

3. If the airline uses AQQ, at the end of the flight does the carrier have to send an APIS message or will you be building it based on the query and then reconciling it using the flight close out message?

Answer: The intent is to allow aircraft operators to report a name only once. Here is a simple scenario. An aircraft operator decides to use 100% AQQ to transmit APIS information and it is decided to wait until the individual is at the airport and their passport can be swiped through a document reader. All APIS data is collected and verified, by the aircraft operator, at this time. The aircraft operator sends an AQQ message and CBP would reply back either good to go or not good to go. In the background CBP takes that info and ships it over to APIS as if you transmitted it as an APIS transmission. CBP will systematically build an APIS manifest in the background.

CBP recognizes that in this condition since APIS no longer occurs after wheels up, CBP will possibly be receiving names that don't fly (standbys, connections, etc.). That is the main purpose of the flight close out. The aircraft operator submits all AQQ, secures the aircraft door, the flight leaves, the passenger list is reconciled and a flight close-out message is sent that indicates which passenger are onboard the plane or which passenger are not onboard the plane. CBP receives and acknowledges the message and ships it over to the APIS system and reconciles the manifest with the APIS system. CBP marks off people that did not get on the aircraft, which is used for compliance reporting. The two options for sending the closeout message are – send complete list of all on board or send those that did not board.

4. **Carriers would like to start working on AQQ now, but are trying to determine if they need to do APIS-30. It is believed APIS-30 is a waste of time and code that the carrier could be using to develop AQQ?**

Answer: Based on what has been proposed in the Secure Flight Notice of Proposed Rule Making, carriers will have to develop some sort of batch submission process. As it is expressed in the Secure Flight NPRM, data is expected as early as 72 hours prior to travel. This type of submission would not be accomplished in an AQQ interactive environment; therefore a batch interactive process would best suit the discussed topic.

5. **Are there advantages to doing the interactive batch at -72/-48 with minimal data vs. needing to send another transmission when data is complete for a passenger?**

Answer: If minimal data is submitted at -72/-48 and a vetting response has been received and then an outage occurs just before the flight departure, the carrier has a vetting result and the passenger could be boarded which would minimize the impact of the outage.

6. **If the carrier sends minimal data and there was an outage during collection of the full data, could the carrier skip that phase and send the complete data in the flight close out message? An example would be where the carrier sent the batch at -72/-48, then full data was collected at the airport and no response was received from CBP. Could the carrier ignore that they haven't received an AQQ response and avoid the retry, and transmit the complete information at flight close out?**

Answer: The carrier would have the vetting result from the batch process, if an outage occurred so that if an update AQQ response was not received, the carrier is allowed to maintain the prior vetting result on that individual. However, at some point the updated information needs to be transmitted to CBP.

The purpose of the flight close-out message is to identify those travelers, previously vetted, who are traveling and boarded an aircraft. The flight close-out message is not structured, nor should it be used, to meet full and complete APIS data requirements. The APIS Pre-Departure Rule clearly states, full and complete APIS data is required, prior to an individual gaining access to their intended aircraft. The flight close-out message is a process, clearly stated by the carriers that cannot be accomplished in most cases, until after the departure of the aircraft. That being expressed and understood, full and complete APIS data must be submitted, prior to a traveler gaining access to their intended aircraft, through a regular PAXLST message, followed by a flight close-out message indicating those passengers actually traveling on a flight, either through the CLNB or CLOB flight close-out message.

In the event, through outage procedures, it is agreed upon that travelers can be boarded without full and complete APIS data, a subsequent APIS PAXLST submission would be transmitted, apart from a flight close-out message. This procedure would be worked out through the outage working group meeting in December 2007.

7. **On batch transmissions, the limit is 999 passengers in one message. Can batch messages be sent for any number based on the limitations of your system as long as it is under 999? Also, in the CUSRES message you can only have 99 passengers.**

Answer: Carriers can send the number of passengers in a batch message based on the internal limitation of their system, as long as it is less than 999 names.

Regarding the CUSRES message, CBP is submitting a request with WCO/IATA to expand that to 999 passengers. Within AQQ the maximum number is 99 names. If the carrier sends more than 99 names, CBP will return a reject message saying the message it too large. CBP will still send this information over to APIS and allow APIS to try to process it. In an AQQ environment if more than 10 names are sent, then the 4 second response time will not apply. The carrier would have to wait longer than 4 second before they start re-tries to get a response.

AQQ Interactive

1. Can the AQQ transmission be applied for an entire family or party within the same PNR at the same time/same counter at check-in?

Answer: The AQQ transmisison option can be used for a reservation containing up to 99 names in a single transmission, however each traveler must be uniquely identified within the transmission to ensure a boarding pass authorization can be uniquely identified to each traveler within the submission. If an AQQ submission contains more than 10 records, the 4 second response time will not be upheld.

Response Messages

1. Is it correct that an acknowledgement from air carriers to DHS is not necessary?

Answer: Carriers will not have to acknowledge messages received from DHS that were originated by the carrier. If the message is an unsolicated message, the carrier is expected to provide an acknowledgement of this message type.

2. If a carrier in the pre-departure (~72 hours) batch process sent a last name/first name and date of birth that matched a name and date of birth on the watchlist, would they get an inhibited response or insufficient data/error response?

Answer: A transmission containing full name and date of birth which matches a name on a watchlist will be returned with an inhibited response. Providing full name and date of birth does not meet APIS data requirements, therefore the response returned is a vetting response and does not include an APIS compliance evaluation.

3. If a carrier gets an inhibited response, what are all the ways a they are able to remove the inhibited response before allowing boarding pass issuance?

Answer: When a transmission is provided in a pre-check-in environment and the initial vetting result is returned 'inhibited', the carrier will be able to provide subsequent information that may resolve the initial 'inhibited' response. If the subsequent information is provided through the check-in process and the vetting response continues to be 'inhibited' the carrier will be provided a 24-hour contact number to call and to resolve the 'inhibited' vetting result. Carriers should contact TSA/OI for further instructions when resolving travelers identified as inhibited.

4. **When a passenger is a selectee passenger and is cleared by phone, will the carrier get an unsolicited message back so they can issue boarding passes/bagtags, or does the carrier have to build a function to overrule the CBP original selectee response manually?**

Answer: For the selectee process, when CBP receives a message into the system and they send back a selectee response, they will give an indicator that the passenger is a selectee. CBP is not locking the PNR or inhibiting the printing of the BP. All they are doing is giving you the status so that you can indicate on the BP this traveler is a selectee. The intention is that you will follow the same process as you do today when you have a selectee passenger.

CBP had established this process for No Fly passengers only. They will have to check with TSA to see what their requirements would be for selectees. When their system identifies a selectee they will send the carrier a message, as well as the TSA OI. They haven't indicated that there are any additional requirements on the side of the carriers or the TSA OI to meet the Security Directives or Emergency Amendments. CBP will check further with them on what action is required when a selectee is cleared.

5. **Today the aircraft operators do not print the selectee indicator on the connecting boarding pass. It is only on the origin boarding pass. Will the aircraft operator need to do anything differently on the connecting boarding pass, if CBP tells them the traveler is a selected on the international flight?**

Answer: The APIS Pre-Departure Rule, published August 23, 2007, does not change the aircraft operator's responsibility for printing of the 'selectee' indicator on a travelers boarding pass. This issue is more closely related to the Secure Flight

Notice of Proposed Rule Making and should be addressed with the publication of the Secure Flight Final Rule.

6. **It has been stated that TSA may require the 'selectee' (SSSS) indicator on connecting boarding passes. How much of Secure Flight can an aircraft operator incorporate into their coding now?**

Answer: In past discussions, the carrier industry indicated they would like to have both the CBP and TSA programs aligned. Under the Secure Flight Notice of Proposed Rule Making, nothing is concrete. Carriers should program what is being required by CBP and possibly program for what may be required by TSA. Carriers are only required to program for what is required in the APIS Pre-Departure Final Rule.

7. **For through check-in, are there two options, one being the carrier can wait for a vetting response and one where the carrier can print the boarding pass, before receiving a response from AQQ?**

Answer: The APIS Pre-Departure Final Rule indicates a boarding pass can be issued to travelers holding connecting flight itineraries. For these passengers the aircraft operator can issue the boarding pass prior to receipt of a vetting result, however, the traveler cannot be boarded on their intended aircraft until a favorable vetting response has been received.

8. **If the passenger is a No Fly and the carrier calls DHS and gets approval to send the passenger. Can the carrier send the message again to get the clearance?**

Answer: Travelers receiving 'no-fly' responses will normally require the carrier to contact the TSA/OI office for resolution. Once resolution occurs, a message, 'unsolicited message', will be sent to the original sender of the data. Since the original sender may differ from the current interested party, it is strongly suggested a subsequent transmission occur, so the carrier can clearly identify the record has been resolved and the traveler can have a boarding pass issued.

9. **Carriers are thinking of mixing both batch transmissions and AQQ at check-in. When it comes to message numbering, would the batch transmission be the first message and the AQQ message number 2 for the passenger?**

Answer: The sequencing of messages, from batch to AQQ, is acceptable. What needs to be understood is the use of the CP code in the BGM segment of the message header. When sending an update for a passenger manifest, batch or AQQ, the BGM+745 segment should indicate the message is a passenger update, with the code CP. An example would be as follows; BGM+745+CP'

10. For some updates, CBP may not send a response back. Is that something that the carrier can control? The carrier will want an acknowledgement from CBP that they received it.

Answer: With regard to CBP responding to carrier submissions of APIS data, CBP will always provide a vetting response. Under the Secure Flight Notice of Proposed Rule Making, there are options of providing qualified and non-qualified informational messages. With these messages, there is the possibility the DHS process will not provide a response. Based on how these requirements are finalized in the Secure Flight final rule, will determine how a carrier might be able to manage their messages.

11. If the agent makes several attempts to get the AQQ Result and it appears there is an outage, can you go ahead and accept the passenger? Is it up to the airline to try again later for those passengers or clean them up at APIS -30? How would that work?

Answer: It is the expectation of DHS that check-in agents will not be attempting multiple entries, determining if there is an outage. Multiple entries, to determine if there is an outage, should be handled by the carriers system. Once an outage has been identified, the carrier should move to the outage process that has been established

12. Under what circumstances would a carrier get an error response?

Answer: Initially errors will be based off the last name, first name and DOB. As long as the aircraft operator has provided the last name, at least an initial for the first name and a valid DOB, CBP will perform a query and provide a vetting result. If any of these fields are determined to be invalid, then the carrier will receive an error. The APIS submission is not validated against the APIS data requirements for overall sufficiency rate.

Unsolicited Messages

1. How is the change of status from 'not cleared' to either 'selectee' or 'cleared' communicated to the air carrier?

Answer: In most cases a passenger that is initially identified as 'not-cleared', a resolution process will occur. During that resolution process if the passenger is determined to not be the subject of the record, the carrier may be advised to send another vetting request and will then receive a new vetting response, or the carrier may receive an unsolicited message changing the result from 'not-cleared' to either 'selectee' or 'cleared'. If a carrier submits using an interactive message, the 'unsolicited message' is returned through the same transmission method as the manner in which it was sent. If a carrier uses a SITA connection, the 'unsolicited message' will be returned to the sending address.

2. Are unsolicited messages only going to be used for status change from 'cleared' to 'inhibited'? If not, what other types of info would be included in an unsolicited message?

Answer: If a traveler is initially identified as 'inhibited' and through a resolution process they are identified as either 'cleared' or 'selectee', dependent on the timing of the resolution and a subsequent vetting request, an unsolicited message may be initiated. In that case the message may be sent with either 'cleared' or 'selectee'.

3. What value should the carrier return to DHS, if their system cannot find the passenger referenced by the RFF values in the DHS UNSOL message?

Answer: It has been determined a code of "E" should be added for such a case. The UN/EDIFACT PAXLST Implementation guide will be updated.

4. Page 43 of 66, Table 12 lists that an Acknowledge Response is to be used to acknowledge receipt of an Unsolicited Message. Qantas is concerned that this requirement will do little more than increase transaction costs and check-in processing times. If CBP issues an updated Inhibited or Cleared response is it not sufficient for the aircraft operator to simply follow the SOP for the particular message response.

Answer: As it has been expressed to CBP, by the carrier industry, messages are sent and returned. With the importance and impact of such a message, it should be understood, when an update occurs, a response has to be expected.

5. Pg 38/66 of the Consolidated User Guide - Unsolicited Messages - States that DHS will develop new processes and enhance existing ones for the scenario when a passenger boarding pass printing result had changed after it had been issued and the flight was enroute. Do you know when the operating procedures will be available?

Answer: The procedures expressed in this section will be determined by the results of the Secure Flight Rule publication.

6. How should carrier respond if B/P has already been issued, but DHS has sent an UNSOL stating 'boarding pass issuance' is inhibited? Does DHS plan to send UNSOL messages that would update their prior selectee passenger to a now cleared passenger? Or will these UNSOL messages only be used to change 'cleared' passengers to some other AQQ status?

Answer: The values for element 4440M will equal either Y, for boarding pass issued, or N, for boarding pass not issued. As for unsolicited messages being returned, an unsolicited message will be returned

7. **Once the passenger is boarded, how will the carrier be notified of an unsolicited message?**

Answer: The carriers need to build system support and processes where an Unsolicited Message is received from CBP, on how to handle and deal with this. An 'unsolicited message' will be sent to the original sender of the information. If that happens to be the carriers DCS, then the 'unsolicited message' will be sent there. Action to this message should be handled as it is today. As it is currently understood, carriers contact TSA/OI to determine if the individual identified truly is the individual on the watch list. If it is determined the traveler is the watch list record, the TSA/OI officer will advise the carrier of their responsibilities for removal of the traveler and their associated baggage.

8. **In the Compliance Requirements Reference Guide, it says that during the resolution process if the passenger is determined not to be the subject of the record, you may be advised to send another vetting request and will then receive a new vetting response. Couldn't we say that you will always send an unsolicited message, rather than the carrier sending a new request?**

Answer: If carriers use two different systems, CBP may receive an interactive transmission through one system and will respond back with a not cleared. Then the carrier tries to resolve that individual with a different system. CBP will send the unsolicited message to the wrong system. A safeguard would be for the carrier to resend the AQQ request, so the response goes to the correct system.

9. **Will CBP set up an unsolicited message for multiple flights?**

Answer: An unsolicited message will only be associated to one passenger. CBP will keep a snap shot of the actual message that came in. If the message comes in with 10 names, but there is interest in only one passenger on the list. CBP will echo back the header and trailer of the message but only contains the one name. The unsolicited message will be sent out to the carrier.

The unsolicited message identifying a change to the vetting for a passenger will reflect the same itinerary as appeared on the original PAXLST for the passenger. If on the PAXLST initial vetting request, it contained multiple flights with mixed carriers, then that same itinerary will appear on the unsolicited message. It will be sent back to the carrier or carrier's system that originally sent in the PAXLST message.

10. **What is the latest time that CBP would send an unsolicited message for a flight? Would it be after the flight has been closed out?**

Answer: As long as the itinerary is active, CBP could send an unsolicited message. Different circumstances would be established if the passenger is still in the

airport, if the passenger has boarded the flight, or if the flight is enroute to the U.S. CBP envisions unsolicited messages as being a unique set of circumstances and will be a rare occurrence where the watch list is updated and the passenger is on their flight.

11. When does CBP consider the flight to be closed out (for the purposes of unsolicited messages)?

Answer: Today an inbound flight is considered to be closed out when the individual passenger is confirmed by a CPB officer on arrival in the U.S. On an outbound flight, it is considered closed when the actual estimated arrival date has expired.

12. What does an airline do if they receive an unsolicited message for an inbound flight?

Answer: Under most circumstances a phone call would be made to TSA OI, as is done today, and the carrier would coordinate what action needs to be taken depending upon the threat or circumstances.

13. What happens when an unsolicited message is received after staff has left the airport? How is that handled?

> **Answer:** Unsolicited messages are sent through an automated system and not to a specific carrier's office. Carriers will be responsible for managing unsolicited messages returned during off hour operations. In the event an unsolicited message is returned, the carrier will be expected to contact the office identified in the message or follow established procedures for resolving unsolicited messages.
>
> An unsolicited message may change a travelers boarding pass authorization from 'cleared' to 'inhibited', as well as, change their boarding pass authorization from 'inhibited' to 'cleared'. It would be to the carriers advantage to monitor unsolicited messages as they are transmitted.

14. What happens if CBP doesn't get an acknowledgement from an airline for an unsolicited message?

Answer: Testing will be conducted with all carriers using the two interactive processes. During this testing the carrier or their system will be required to establish the ability to respond to unsolicited messages. Until this ability is firmly demonstrated, authorization for APIS Pre-Departure transmission functionality will not be granted.

Flight Close-Out Messages

1. There are times when we close the aircraft door and reopen it. Will the final Close-Out Message be required to be sent no later than 30 minutes from the first or last door closure?

Answer: Submission of the Flight Close-Out message is required no later than 30 minutes from the last door closure.

2. Because of the above reason there are times when we may have a need to send an updated FCO. Is having multiple FCO Messages acceptable when utilizing the Interactive Individual Message option?

Answer: Multiple flight Close-Out messages are acceptable. Under most circumstances only one Flight Close-Out message should be transmitted, and submission of the Flight Close-Out message is required no later than 30 minutes from the last door closure.

3. If a passenger is booked on a flight, however, a boarding pass request is not submitted and no APIS data is provided and the passenger never checks-in for the flight, is the carrier required to provide the information for this passenger in the Flight Close-Out message?

Answer: If APIS data has not been submitted for a passenger and the passenger does not travel on the flight, passenger information is not required as part of the Flight Close-Out message.

4. This section states that the close-out count may update the final count as previously filed on the General Declaration. Does this clarify that APIS counts will override GenDec counts?

Answer: Carriers are required to provide complete accurate and valid information to CBP, for both APIS and entry requirements (General Declaration). The passenger count provided in the Flight Close-Out message will be one method used when determining APIS sufficiency and establishing the carrier provided complete and accurate data for each traveler onboard the flight.

5. Is the Flight Close-Out message a mandatory or an optional requirement?

Answer: The Flight Close-Out message is mandatory for carriers using the interactive batch and AQQ transmission methods.

6. The close-out message applies only to the interactive transmission option? What is the procedure with non-interactive batch transmission option?

Answer: The non-interactive batch process is expected to be used by carriers submitting under the eAPIS process and a separate Flight Close-Out message will not be expected.

7. Pg 40/66 of the Consolidated User Guide - Is it our understanding that carriers will no longer need to call in the updated counts once a final Flight Close-Out message is sent?

Answer: The Flight Close-Out message will be used to determine the number of passengers on board an aircraft; however, it will not replace the requirement to provide an accurate and complete general declaration.

8. In the Flight Close-Out message it was our understanding that a carrier could send the full APIS manifest along with the PAX ID of those passengers boarded. Is that correct?

Answer: The Flight Close-Out message has never been discussed as a message that would complete APIS submission requirements. The Flight Close-Out message occurs after departure. Full and complete APIS data is required prior to securing of the aircraft doors.

9. Please clarify if Flight Close-Out message can only report all passengers boarded?

Answer: When coding the Flight Close-out Message, the carrier will either use the code indicating that the records provided represent those passengers that were boarded or use the code indicating that the records provided represent those passengers previously submitted but who did not board the flight. This was requested by the carriers in various meetings. Carriers have the option to determine which submission best suits their systems.

10. When is the 'FCO only' designation to be used by the carrier? BGM + 266 + CL What supporting sub-elements would need to be included? Could an example of this be added to the Appendix?

Answer: A scenario that would involve a Flight Close-out only message would be a carrier opting to provide a Flight Close-out message containing those records, previously submitted, that did not board an aircraft and finding that all names previously provided boarded. In order to accomplish a proper Flight Close-out message, the Flight Close-out only option was provided. Section 6.5.2 references a Flight Close-out only message and an example is not provided. The Appendix will be updated to cover an example.

11. **If a passenger is sent on the batch at -72 hours and then doesn't show up at the airport, does the carrier need to advise CBP in the flight close out message that this passenger is not traveling?**

Answer: Based on the type of flight close-out message used by the carrier, the above individual would be recognized as not boarding their intended aircraft.

12. The carriers understand that there is a flight cancellation message. What needs to be done with this especially when there is a date change involved?

Answer: Under the CBP requirements, carriers would send a flight close out message stating the flight was cancelled. For the date change, flights may be scheduled to arrive at 1159P, but end up being delayed until after midnight. CBP wouldn't want carriers to submit a new flight every time. CBP is still working on solutions for this.

Carriers can either cancel the reservation per person or can wait until the flight closeout occurs and then tell CBP what actually happened to the flight. You can do it at one time to resolve all of the cancellations and rebookings or you can do it as it occurs through the cancel reservation/change reservation process. If the flight is cancelled due to weather or mechanical issues, then the message states that the entire flight is cancelled. On a date change, if the flight goes past midnight, don't change the date. Underneath the flight close out message there is an opportunity to communicate to CBP what the actual departure date and what the estimate arrival date of the aircraft are.

13. On flight close out messages for flights inbound to the U.S. (ROM – LON – JFK). Are carriers required to send 2 close out messages? One at ROM for passenger from ROM to JFK and one at LON?

Answer: The flight close-out message should be sent from the airport of departure that brings the passengers into the United States or takes them from the United States. Sending of full and complete APIS data from down-line airports, however, the flight close-out message must represent a list of those previously identified travelers that either did or did not board the aircraft.

14. If a passenger was traveling ROM – JFK, but was offloaded at LON would it be sufficient if the carrier sent CBP the details of the passenger who boarded in LON, as well as the ROM passengers, but with this passenger excluded in the LON manifest? Would CBP be able to reconcile the flight?

Answer: If a traveler initially intended to travel from ROM to JFK, with a carrier stop-over in LON and for some uneventful reason, the traveler off-loaded in LON, the carrier's flight close-out message would identify the traveler is not on the flight from LON to JFK.

eAPIS

1. Can we still use e-APIS for submission of non-interactive batch transmissions?

Answer: The eAPIS Web Portal will continue to be an option for submitting APIS manifest data under the new APIS Pre-Departure requirements.

2. If using e-APIS to submit non-interactive batch transmissions how will carriers be made aware of any not-cleared and selectee status? The rule states the CBP system will respond to non-interactive batch transmissions by sending a message to the carrier via a non-interactive transmission method – what does this mean?

Answer: The CBP system will send email messages to carriers using the eAPIS non-interactive transmission method. To ensure the correct office is notified, carriers should update their point of contact information with their CBP APIS Account Manager.

3. For flights to Cuba, an aircraft is wet leased to a Charter Company. The Charter Company remits eAPIS to CBP via batch. Will Charter Companies continue to be permitted to remit eAPIS and will the Charter Company indicated on the eAPIS transmission or the operating carrier be notified of not-cleared or unsolicited messages?

Answer: Charter Companies can continue to submit APIS data through eAPIS, and the submitter will receive the response message.

4. The Rule states that if carriers cannot develop AQQ by the 180 day deadline, they must provide APIS by -30 in a non interactive method (e.g. like today). However, the Rule states that boarding passes cannot be issued until after the -30 manifest vetting has taken place.

Answer: Carriers are currently required to provide APIS data no later than15 minutes prior to departure for flights departing from the United States, the APIS Pre-Departure requirement shifts the submission to no later than 30 minutes prior to securing the aircraft for flights departing from and arriving into the United States. The 30 minute timing is, once again, a "No Later Than" requirement. Carriers are encouraged to submit data earlier in the process to meet both the flights security requirements and the carriers' operational needs.

5. Under the non-interactive 30 batch option: would the air carrier be required to wait for the response from DHS before:
   a)   printing the boarding pass;
   b)   boarding the aircraft?

Answer: Under the non-interactive batch submission option, the primary transmitter of this data will come from the eAPIS functionality. Using the eAPIS function, the carrier would need to receive a screening result before allowing the traveler to gain access to their intended aircraft.

6. For batch non-interactive, if we send 10 passengers in a message, and DHS sends one PAXID that indicates they are inhibited', will they send a PAXID for each of the other 9 to indicate they are cleared? The FR indicates that you would only get a vetting result for selectee or inhibited. For those on a manifest where all passengers were cleared, would we get a response without any vetting results? Our IS indicates that this could be problematic, that they would be expecting a response for each PAXID.

Answer: The non-interactive batch process is strictly related to eAPIS submissions or submissions that are incorrectly coded in the UN/EDIFACT header, where the system does not see the message as interactive. If the message header is formatted to indicate the carrier expects to receive a response and each name is uniquely identified, within their NAD segment, the vetting response will be returned with an individual vetting response for each record. If each name is not uniquely identified, within their NAD segment, then the vetting response for individual travelers may be significantly impacted.

Connecting Passengers

1. For customers who are connecting domestic to international can we transmit AQQ at the origin station, instead of waiting until they get to their connection location?

Answer: The purpose of APIS Pre-Departure is to ensure travelers matching the watchlist do not gain access to their aircraft. Carriers with the ability to provide APIS data at a travelers origin station are encouraged to submit APIS data as early as possible. Steps are being taken to amend Security Directives (SD) and Emergency Amendments (EA), issued by TSA, that will allow carriers to apply vetting responses received from CBP against a travelers domestic itinerary. Until the SD's and EA's are amended, carriers are responsible for vetting the domestic segment and would then apply the CBP vetting response for the international segment.

2. Can a carrier issue a boarding pass to a traveler traveling from one foreign airport to another foreign airport and then their US destination airport, without receiving a vetting response from the government?

Answer: As stated in the APIS Finlal Rule published in the Federal Register on April 23, 2007, carriers with connecting passengers arriving at the connecting airport already in possession of boarding passess for a U.S.-bound flight, these passengers cannot be boarded until all required manifest data has been transmitted and a boarding pass authorization has been received.

3. Will a carrier requesting a vetting response for a passenger holding a routing of Cairo-Zurich-New York be able to do so using the AQQ option?

Answer: If a carrier provides a travelers complete itinerary within the TDT and LOC segments of their submission, the CBP AQQ process will be able to provide a response to the sender of the message. As stated above, carriers with travelers holding a routing from multiple international airports, prior to their U.S.-bound aircraft, can issue boarding passes, so long as the traveler is not allowed to gain access to their intended aircraft, until a proper vetting response has been received.

4. Example routing: Miami – New York – Zurich. Assuming that we received the cleared response for the domestic leg, is there any further vetting necessary for the leg JFK-ZRH?

Answer: Under the current Emergency Amendments and Security Directives, issued by TSA, carriers are responsible for the vetting of passengers with domestic legs. The APIS Pre-Departure program will take over the vetting for the international leg only. The transmission of APIS data is required for all international arrivals and departures, the CBP system will provide a watchlist screening response for all APIS transmissions until watchlist screening is conducted by Secure Flight.

5. In the scenario with a passenger having an itinerary of London to Chicago on one carrier and an itinerary of Chicago to Omaha on another carrier, is the carrier holding the domestic segment required to get a vetting result and apply all security restrictions on the domestic leg of this itinerary, since there is an international segment within the directional travel itinerary?

Answer: Travelers having an international flight itinerary submitted are required to have complete APIS data provided, prior to gaining access to their intended international flight. Carriers should follow TSA security requirements for domestic passengers and domestic flights.

6. Do the requirements change at all for the domestic segment of this trip, if the direction changes (now outbound US) OMA-CHI CHI-LON Would the carrier holding the domestic leg have to get a vetting result on the domestic leg of this trip (and apply all security restrictions boarding/not boarding psgr and baggage)?

Answer: Carriers should follow TSA security requirements for domestic passengers and domestic flights.

7. Is the vetting result per leg or per trip? The Consolidated User Guide indicates per flight leg. Our IS counterparts say this could be a nightmare in terms of exposure to have a different vetting result per leg vs. one vetting result that applies to entire PNR/trip.

Answer: Travelers having international flight itineraries require complete APIS data submitted, prior to gaining access to their international flight. Carriers should follow TSA security requirements for domestic passengers and domestic flights.

8. How would we handle directional travel? For example, for the itinerary YVR-ORD-NYC-LHR?

Answer: APIS submission requirements have always stated, a separate APIS submission is required for a traveler's arrival and departure flights. In the example YVR-ORD-NYC-LHR, the single direction arrival submission should contain, at a minimum, YVR-ORD. The single direction departure should contain, at a minimum, NYC-LHR. Dependant on the carrier system knowledge, the segment ORD-NYC can be either a part of the traveler's arrival or departure submission. Within the submission, the carrier has the opportunity to provide the traveler's point of embarkation and point of final debarkation, thus eliminating the requirement to provide an address in the United States, when the involved traveler is a foreign national.

9. From a PAXLST EDIFACT stand-point, is there a way now or can we develop a way to send all passengers including their full itinerary in a flight batch manifest? In other words, how does DHS expect the carrier to transmit the information for passengers that come from various cities and then connect to a flight that is departing the United States? Can it be done in one manifest or does the carrier have to send a different message for each traveler?

Answer: Under the current PAXLST version of UN/EDIFACT, there is not an opportunity to allow the individual indication of a traveler's flight numbers and airport of departure and arrival information. Therefore, when a carrier develops the ability to provide a traveler's multiple flight itinerary, in order to receive one vetting response for all legs, the carrier code, flight number and arrival and departure locations provided can only be associated with the names provided within the PAXLST message. For example, carrier XX has a flight 123, departing MIA and traveling to IAD and then carrier XX has flight 332 departing IAD and traveling to JFK and then carrier XX has a flight 975 departing JFK and traveling to LHR, only passenger's traveling on the above identified flight numbers can be submitted in the same PAXLST message. If there were to be a traveler starting their journey on carrier XX flight #332, from IAD to JFK, and continuing on XX flight 975, from JFK to LHR, a separate PAXLST submission must be made. At no time in the above example of a transmission of MIA-IAD-JFK-LHR, could a carrier provide information for a traveler going from MIA to IAD or IAD to JFK or MIA to JFK. These are considered purely domestic transmissions and are not acceptable for APIS submissions.

Carriers can submit an APIS manifest, as they do today, for a flights departure from one airport to another airport, crossing international borders, and receive a vetting response for those travelers provided. Under this type of submission, travelers holding domestic legs of travel would be required to be vetted by the

individual carriers, as prescribed under current TSA watch list vetting requirements.

Verifying Passenger Information/Provisional Boarding Passes

1. The "provisional boarding pass" is not discussed in the Consolidated User Guide. What are the documentation requirements for a provisional boarding pass?

Answer: The APIS Pre-Departure Final Rule does not establish requirements for issuing provisional boarding passes. Carriers are required to submit complete APIS data no later than 30 minutes prior to securing of the aircraft for batch submissions and no later than up to securing of the aircraft for APIS Quick Query (AQQ) submissions. The Federal Register posting, pg 48331, indicates that travelers with connections can have a boarding pass issued, without receiving a screening response. The carrier in this instance would inhibit boarding until an appropriate screening response is received.

2. Section 5.3.3 of the Consolidated User Guide - Indicates that verification/validation is only required for those who have had an inhibited boarding pass printing result - is this correct?

Answer: Validation of submitted data is to occur prior to a traveler gaining access to their intended aircraft, regardless of the boarding pass printing result.

3. Federal Register pg 48331, if a customer has a provisional boarding pass, can that customer be "verified" at the gate in order to receive a final boarding pass, or does this need to happen prior to passing through the security checkpoint? This question refers to original off-site check-in, not connections.

Answer: Where DHS has authority, a boarding pass cannot be issued until an appropriate screening response has been received. In those cases where the traveler is originating at a location outside of DHS authority and prior to Secure Flight implementation, a boarding pass may be issued, so long as the individual is not allowed to gain access to their intended aircraft without an appropriate screening response.

4. Is there an explicit requirement for DHS about when international document must be validated, what must be validated, when and by whom?

Answer: Established in the publication of the original APIS Final Rule, April 7, 2005, carriers are responsible for validating the information provided the CBP is accurate and correct, compared with the travel document presented by the traveler. Having that understanding, carriers are expected to validate APIS data previously provided, against that which is presented by the traveler, before gaining access to their intended aircraft. Validated data will only include that

information is normally found in the machine readable zone of a travelers acceptable international travel document. In the case where a carrier is not able to validate the data using a document reader, visual validation would include, full name, date of birth, gender, document type, document number, document country of issuance and expiration date (if provided). Carriers are not expected to validate address information provided by a traveler. Validation of data must occur at the physical airport of departure, whether it be at a kiosk, check-in counter or departure gate area.

System Outages

1. What are the backup methods for a system outage so we don't have the LAX event happen again?

Answer: During the testing and implementation phase, CBP will work with carriers to establish additional outage procedures based on their operational processes, including transmitting data from alternate locations or using alternate transmission methods such as switching from AQQ to Batch methods. Carriers are encouraged to submit APIS data early in the process to receive screening responses well before securing of the aircraft. CBP is also working to establish additional protocols to limit the impact of outages.

2. If we are intended to use an internal fallback process, do you believe carriers should continue to maintain the new CBP system as well as our own system? Shouldn't CBP have a fallback method, not the air carriers?

Answer: The CBP APIS process currently is a redundant process, for circumstances where outages occur despite system redundancy, alternate processes should be in place. Certain carriers will need to maintain their own system during the transition to meet other requirements, such as screening domestic flights. During the testing CBP will work with carriers to establish additional outage procedures based on their operational processes. Carriers are encouraged to submit APIS data early in the process to receive screening responses well before securing of the aircraft, as one method for limiting the impact of outages.

3. If AQQ experiences an outage are carriers to transmit their lists in batch format or follow another procedure (i.e., contact TSA to vet the watchlist)?

Answer: During the testing CBP will work with carriers to establish additional outage procedures based on their operational processes, including transmitting data from alternate locations or using alternate transmission methods such as switching from AQQ to Batch methods. Carriers are encouraged to submit APIS data early in the process to receive screening responses well before securing of the aircraft, in turn limiting the impact of outages.

4. If e.g. connection between an aircraft operator and CBP is complete: when would the aircraft operarot realize that something is wrong? What procedure should they employ?

Answer: Carriers using the AQQ transmission method would identify there is a possible outage when their system attempts to send a message and after 5 attempts to receive a vetting response, nothing has been returned. At that time, the carriers security office should contact the DHS Service Center to determine if there is an outage. At the same time, the carrier should contact their National APIS Account Manager to determine if there is an outage at CBP and what next steps may be taken.

5. Pg 64/66 of the Consolidated User Guide references the ability, when systems are back up, to resubmit all messages that couldn't be submitted to DHS.

Answer: System outages will be handled on a case-by-case basis with regard to APIS requirements. The procedures indicated in this above referenced page are associated with boarding pass requirements, which is related to Secure Flight.

6. **If a timeout occurs, carriers are concerned about the number of re-tries that may occur. There could be hundreds of agents checking in across the system, getting timeouts, which will lock up their set's, because internally the system is doing re-tries. How are carriers to handle re-tries and outages?**

Answer: CBP has met with a small group of carrier's, to discuss what would constitute an outage and how it should be handled by the aircraft operator and the government. CBP will comprise a list of what will be considered outages and the procedures associated with the identified outages. This list will in no way be considered an exhausted list, however, expects to cover those situations that are believed to be the primary conditions termed "an outage".

7. **Once an airline has done the 5 re-tries, there is a common access reference in the UNH segment which could identify that all messages are part of same kind of conversation. There is an industry standard for using the CAR segment to exchange the sending and recipient part, where it is expected that the recipient will echo back what the querying system has sent and append their part of the CAR. It appears that** CAR has not been considered in the CBP document yet?

Answer: The CAR (Common Access Reference) is on the UNH segment. Many of the illustrations and sample EDIFACT documents in the EDIFACT guidelines do not include the CAR on the UNH segment. However, if you programmed to send that, it will continue to be echoed back both for AQQ and SF. There is continued support for that.

Since the messaging process is now response based between the carriers and DHS, there is a need to reconcile the responses to particular PAXLST

submissions. The RFF segment was identified to be able to provide that type of reference number in addition to the SF need for the sequencing. They looked at the RFF segment for that to satisfy both objectives. There is a sequence number on the UNH segment, however, that is not specific to an incremented subsequent update to an existing passenger data submission. It is more aligned to a batch transmission and the order in which the transmission are sent. They opted to go with the RFF segment to satisfy the TSA, as well as an optional use for the carriers to reconcile that reference in their system.

8. **When a timeout occurs, can a carrier go ahead and search the watch list internally and based on that produce a BP so that passengers can go to the boarding gate?**

Answer: Outage procedures are being established and will be incorporated in the Consolidated User Guide. Specific instructions will be provided, to determine what steps will be followed during an established outage.

9. **In an example where an address was added but couldn't be sent because of an outage, it isn't possible to send it in the flight close out message. Do you suggest that carriers revert to the APIS post departure message?**

Answer: In the event an outage has been identified, and the procedures have been established to allow aircraft operators to continue boarding passengers with a valid boarding pass issuance authorization, but do not have full and complete APIS data, it is possible in the outage procedures the carrier will be afforded the ability to provide a full and complete APIS transmission, post departure. This process will have to be further determined in the, yet to be published, outage procedures.

10. **If the passenger received a status from the batch process and a timeout occurs on the interactive message, it was stated that the carrier should keep the previous status. However, the carrier needs to know that the timeout occurred, as they are going to keep sending the message over and over again. Does the timeout override the previous decision?**

Answer: It depends on how long the outage is and at what point you retransmit the data. Within the CBP system if you initially send complete name and DOB at -72/-48, you would receive a screening result. Outage procedures will need to identify what steps should be taken, in the event a vetting result was received, however only minimal APIS data was provided for the vetting result.

As stated previously, outage procedures have not been fully established. Efforts are being taken to resolve outage procedures.

Data Monitoring/Fines

1. How does DHS check/monitor the 30 minutes deadline, knowing that the exact time of closing the doors is never known in advance? Would DHS be of the opinion that late queries would be the sole risk of the air carrier?

   Answer: DHS will use several methods to ensure carrier compliance with transmission time requirements, including monitoring the estimated time of departure received in the submissions.

2. How will APIS Pre-Departure affect the current APIS sufficiency measurements and compliance/penalty structure? Is there the expectation that compliance would be 100%? Is that based on the number of records being sent vs. data quality in the data sent? For example there are data field edits to ensure that DOB is in the correct format and to flag single digit names as errors. Will these errors continue to affect the 100% sufficiency? In Secure Flight there is mention that they will recognize that passengers can have a single digit first name. Is there a change in the current eAPIS reports related to first name edit?

   Answer: CBP will continue to maintain the current validation rules for APIS submissions. It is expected that carriers will, or already have, instituted validation checks within their own systems to ensure valid dates are provided.

3. Section 4.3 of the Consolidated User Guide references 100% compliance - is this based on just 100% compliance for sending APIS for passengers on board, not overall sufficiency after subtracting any errors related to data validation errors?

   Answer: 100% compliance has always been the requirement for APIS transmissions. The statement in section 4.3 is referencing the submission of 100% of the names onboard.

Secure Flight

1. Table 9 of the Consolidated User Guide (and other subsequent tables) indicates that PNR never changes. In fact the record locator can change in various situations. Should this change to "informational" instead of "never changes"?

   Answer: Comments related to the 'informational' change requirement, should be submitted through the Secure Flight NPRM process.

2. Pg 11 of the Consolidated User Guide Appendices - Table 2 Section 7.2.2.3 - states that the verified ID must be sent at time of purchase at ATO and/or boarding pass request. Is this only for those passengers previously inhibited, or for all passengers who purchase a ticket at the ATO day of departure?

   Answer: The verified ID indicator is a Secure Flight requirement and needs to be addressed through the proper comment procedures of the Secure Flight NPRM.

3. Pg 31/66 of the Consolidated User Guide references a verified ID indicator - what exactly is this field and how does it pertain to the pre-departure rule?

Answer: This is a Secure Flight requirement and does not pertain to the Pre-Departure Final Rule.

4. Is the Gate Pass Request due by February 19, 2008?

Answer: The Gate Pass Request is a Secure Flight proposed requirement and is not expected for the February 19, 2008 date.

5. Regarding Change Passenger Data on Page 68/69 of the UN/EDIFACT Implementation Guide (BGM type 745 Document ID – CP and CF with examples on Page 196 B.11. Qualified Change and Page 198, B.12. Non-Qualified Change):
    When would this message be used?
    What would trigger this message type?
    What is a qualified change?
    What is a non-qualified change?
    Should this type of message be able to be done by Feb. 19?

Answer: The Change Passenger Data submission is a Secure Flight proposed requirement. It can be used to update a previous APIS submission if the APIS data has changed and the passenger data needs to be updated. Under normal circumstances, sending a subsequent APIS transmission will suffice. Qualified and Non-Qualified changes are Secure Flight proposed requirements.

6. Regarding Reduction in Party on Page 68/69 of the UN/EDIFACT Implementation Guide (BGM type 745 Document ID – RP with example on page 200 B.13. Reduction in Party):
    When would this message be used?
    What would trigger this message type?
    Should this type message be able to be done by Feb. 19?

Answer: The Reduction in Party function is a Secure Flight proposed requirement and is not expected for the February 19, 2008 date.

7. Regarding Change Flight Information on Page 68/69 of the UN/EDIFACT Implementation Guide (BGM type 266 Document ID – CF Change Flight Information):
    Will we be doing the Change Flight Information type message?
    What is the Change Flight Information message?
    What would trigger this message?
    Note: we would need an example of this type of message.
    Should this type of message be able to be done by Feb. 19?

Answer: The Change Flight Information submission is a Secure Flight proposed requirement and is not expected for the February 19, 2008 date.

8. Consolidated User Guide, Page 12, states: "This proposed rule would not compel the passenger or non-traveler to provide the majority of the information requested by the aircraft operators. However, if that individual elects not to provide the requested information, TSA may not be able to distinguish him or her from an entry on the watchlist. Accordingly, the individual may be more likely to experience delays, be subject to additional screening, be denied transport, or be denied authorization to enter a sterile area." Does the proposed rule prohibit aircraft operators from accepting a reservation, generating a PNR, or accepting a request for authorization to enter a sterile area from an individual who does not provide a full name?

Answer: The question being asked is related to Secure Flight and needs to be addressed through the proper Secure Flight comment process.

9. Does CBP have any retention requirement for the carriers to retain data in regard to message transmissions, vetting results, etc?

Answer: Vetting result retention is a part of the Secure Flight proposed rule.

10. When Secure Flight becomes effective, will both CBP and TSA send back a result in the Response Message?

Answer: Once Secure Flight is performing vetting for all domestic and international flights, only one response will be received by the carrier.

Support

1. Does CBP expect to have a 24 hour phone/email contact for the unsolicited messages?

Answer: Carriers receiving an unsolicited message will continue to have the ability to contact a 24-hour DHS phone number for resolution assistance. Carriers identifying travelers on the watchlist currently have 24-hour DHS contact phone number for resolution, this will continue.

2. For the contact email address does this need to be 24 hour?

Answer: Carriers transmit APIS data as part of their 24-hour flight operations and the point of contact information, including email contact need to be available as part of the 24-hour operation.

3. Will there be a user guide for batch transmissions and the use of e-APIS? Is so, when?

Answer: The Consolidated User Guide and the UN/EDIFACT Implementation Guide, along with the APIS Pre-Departure Final Rule, should be used as guides for both APIS-30 and APIS Quick Query (AQQ) development. The eAPIS option is described in the APIS Pre-Departure Final Rule as the non-interactive option for carriers. eAPIS has been updated with News links and Contact Sensitive Help selections to provide additional information and guidance.

4. Until now only carrier's security department have had contacts with TSA as the designated contacts. Now can any check-in agent contact TSA?

Answer: The screening response is sent to the sender of the information. It is suggested the carrier continue to use existing processes including their security department in the resolution process. It is understood the check-in agent will have the traveler in front of them and may be able to provide additional information for the resolution.

Miscellaneous

1. The table does not mention class of service as a qualified or informational item w/in the itinerary. Can you clarify if you will be looking at this information? I.e. A customer is coach and upgrades to first or business.

Answer: Class of service is not a required APIS data element under the CBP APIS Pre-Departure Final Rule. Class of service is part of the PNR discussion and it is presented as an option to the carrier, it is not a mandated requirement.

2. Will the current "prevent departure list" issued to the carriers by DHS be included in Phase 1?

Answer: The 'prevent departure list' is not currently incorporated within the watchlist and the APIS Pre-Departure process.

3. What is CBP's response to Sabre's letter stating that February 19th implementation of APIS 30/AQQ is unworkable?

Answer: CBP proposed new requirements in the APIS Pre-Departure NPRM published in the Federal Register on July 14, 2006 and has been working with the carrier industry to raise awareness of the changes. The APIS Pre-Departure Final Rule established the requirements would become effective 180 days from the August 23, 2007 publication date. CBP is currently working with carriers and service providers to implement the changes within the established timeframe.

4. Would DHS expect a similar number of not-cleared or selectee passengers on carriers as the carriers see today?

Answer: Based on data currently received by carriers, CBP anticipates a similar number of not-cleared and selectee results.

5. Does the definition of securing of aircraft doors indicate the passenger door or the cargo doors? Could this be equated to an OUT event?

Answer: Securing of the door relates to the point in which a passenger can gain access to an aircraft. As the cargo door is not the normal point of gaining access to a regular passenger operated aircraft, the securing of the aircraft doors is associated with the securing of the door in which passengers entered.

6. Parallel or Redundant processing - If our internal processing flags an individual as a selectee, but the government doesn't say they are a selectee, what should we do?

Answer: If the passenger is traveling on an international flight, the response provided by the DHS system is what the carrier should use for boarding pass issuance coding.

7. Audit Trail/Accountability - Today, there are occasions where we receive calls that APIS was never transmitted. Should we retain the individual records or cumulative information sent for the occasion there is a question that an individual's APIS data was not sent?

Answer: Maintaining an audit trail is always suggested.

8. Pg 17 of the Consolidated User Guide references Training Support Documents - Do we know when these modules will be available? Specifically, in regards to Module 2?

Answer: CBP is currently working on the development of Module 2 training and expects to have it available October 2007.

9. Section 4.9.3 of the Consolidated User Guide - International Travel (Messages & Response), does this apply to both batch and non-interactive, or only interactive batch and interactive individual?

Answer: I believe you are referencing section 4.8.3 of the Consolidated User Guide – International Travel (Message & Response), in this question. The examples provided are related to interactive batch and AQQ.

10. The Consolidated User Guide is SSI. Where can individuals go to obtain a copy of this if they do not have access to the TSA secure site?

Answer: Individuals that do not have access to the TSA secure web-board can obtain a copy from ATA or IATA headquarters, from the News link of eAPIS, or from a National APIS Account Manager.

11. Are we allowed to load baggage if we have not yet received a vetting response? Understanding we would remove the baggage and not transport the baggage for any passengers who receive a not cleared response. Does the final rule prohibit us from physically loading the baggage onto the airplane prior to the receipt of a cleared or selectee message?

Answer: The Final Rule establishes that the carrier must not issue a boarding pass to, or load the baggage of, any passenger subject to a not-cleared instruction. In the case of connecting passengers, the carrier must not board or load the baggage of any such passenger until the CBP system returns a cleared or selectee response for that passenger.

12. Can you provide the standard ICE procedures that you reference in this section?
Answer: The CBP APIS Pre-Departure Final Rule does not cover Immigration and Customs Enforcement (ICE) standard operating procedures. Questions related to ICE procedures for the deportation of individuals should be addressed to ICE, a component agency within DHS.

13. Does CBP use the name found on the passport or the name in the PNR?

Answer: Name is based on what is found in the Machine Readable Zone of an individual's acceptable traveler document, for international travel. In those instances that a carrier is unable to use a document reader to collect the data, manual collection should be that information found in the biographical page of the individuals acceptable international traveler document, to include full name, date of birth, gender, document type, document number, document country of issuance, document expiration date (if provided), country of nationality.

14. Can PAXLST messages, passenger and crew, be grouped together within the same UNB/UNZ or sent as separate enveloped PAXLST messages in the same transmission?

Answer: No, separate message transmissions must be utilized when sending passenger and crew information, regardless of transmission options used.

15. Will the watch list still be available to carrier's security departments to monitor flights?

Answer: The watch list requirement is a TSA requirement, not CBP. Carriers will continue to be required to vet their employees, until a date established by TSA relieves the carrier of this responsibility. As far as CBP understands, the watch lists provided to the carrier industry will continue to be available for downloading.

16. If a carrier was going to download for employee vetting, a carrier could use it for their own international flights that don't travel to the U.S. as they would be looking for people who aren't desirable?

Answer: Additional CBP comment: The vetting of travelers on US flagged carriers, traveling from one international airport to another international airport, is a TSA requirement. It has been proposed in the Secure Flight Notice of Proposed Rule Making that Secure Flight will take this responsibility at a future time. Based on current TSA requirements, the vetting of names against the watch list, for international to international travelers, is still the responsibility of the US flagged carrier.

During outages, there have been suggestions that carriers could use their internal system that they are currently using because they would still need to download the watch list for employee vetting or for other domestic or international to international flights.

The intent was for DHS to take the watch list back from the carriers so the carriers don't have to have that burden. APIS Pre Departure will be a step towards it, but it won't eliminate the need for carriers to have it. The other requirements will still necessitate carriers to do certain screening.

CAPPS is a TSA program and is not going away.

17. If a carrier can achieve AQQ or APIS -30 before 19FEB08, can they stop checking the No Fly list immediately?

Answer: Anyone who interested or ready to start with AQQ or the batch process should contact their CBP APIS account manager. They would go through the certification process for DHS to conduct No Fly vetting and Selectee vetting. Carriers can do this before 19FEB, if they are ready before that.

Networking Questions

Transmission Companies

1. Which company/transmission does CBP use?

Answer: The CBP system supports and utilizes several transmission options.

2. Which of the transmission options does CBP prefer?

Answer: CBP will provide information to carriers to assist in evaluating which transmission option will best suit their needs. The selection of a transmission option will be a business decision on the part of the carrier.

3. Consolidated User Guide v1.0 Part 2, pg 57, Does CBP use SITA or ARINC or another vendor for its own programming as we may choose to use the same vendor? Which company/transmission does CBP use?

Answer: CBP currently receives APIS data thru both SITA and ARInc connections.

4. Does Sabre have to test each carrier separately with CBP, or can Sabre test with CBP just once?

Answer: CBP expects to test with the various service providers currently sending APIS data for multiple carriers. Once CBP has completed testing with these service providers, they should notify their customers, so the carrier can make the business decision to test the service provider product if they so choose to. CBP would encourage the carrier to conduct testing, as the final responsibility lies with the carrier and not the service provider.

5. What other providers of MPLS can we order circuits from?

Answer: Sprint and Verizon are the only current providers approved by CBP for MPLS network connectivity.

6. **If the carrier communicates by MQ, do you establish the identity of that carrier (that system and flight) on MQ, or would CBP allow a parallel transmission under the Type B channel for existing post departure messages?**

Answer: CBP treats them independently – the carrier could simultaneously send a Type B message and a MQ connection (batch transmission or interactive transmission) and set it up with middleware to establish two separate MQ environments, one for interactive processing and one for batch processing strictly over MQ. Every carrier would be separately defined and would have their own MQ environments so they don't impact one another. Type B can be sent over MQ as well.

Ability to Respond

1. When will CBP be ready to respond to interactive queries and when will the CBP AQQ product be available for carriers to test the functionality?

Answer: The CBP system is currently ready to respond to interactive queries and CBP is prepared to test AQQ functionality with carriers.

Testing

1. Is there anything different that CBP would have to do to test the -30 requirement now?

Answer: CBP has made internal system updates and is ready to conduct testing with carrier's interested in implementing changes to meet the requirement to submit batch manifests no later than 30 minutes prior to securing the aircraft.

2. If a carrier wanted to do a preliminary test to assess the impact of closing out a flight - 30, what would CBP need in order to accomplish this and what would the carrier expect as a response?

Answer: Based on business practices, certain carriers with international flights have indicated they currently close out flights and submit APIS data in advance of securing the aircraft. Carriers could adjust their procedures to close-out procedures and simply start submitting data no later than 30 minutes prior to securing the aircraft. CBP will work with carriers and focus testing on the receive functions of the APIS interactive process.

3. Are the Account Managers responsible for testing? If so, how could this impact the timelines? There is a real concern over CBP having the resources assigned to assist carriers in certification. This is a huge programming change, and likely the bulk of carriers won't be ready to test until the last months. Is CBP able to support that, and if not, how will that be taken into account in terms of meeting the mandated date?

Answer: CBP completed AQQ Tester training and has established a core of testers. As carriers request involvement in the APIS Pre-Departure project, they will be assigned an AQQ tester and communication will be initiated. Initially the testers will include the APIS Account Managers.

4. Test Scenarios - 33/34/35/36 - Cancel Passenger submission: When exactly would we need to do this for AQQ? I thought the intent was to send a Flight Close-Out message which would accurately show everyone who had or had not boarded. Why would we need to also send a Cancel Passenger Submission request?

Answer: Carriers are not expected to complete the Cancel Passenger submissions for APIS Pre-Departure testing. These are tests that can be accomplished if the carrier wishes, so that when the carrier transitions to Secure Flight testing, they will be able to demonstrate they accomplished this type of message submission.

5. Test Scenarios - 55/56 - Flight Cancellation Message: I was under the impression that the Flight Close-Out message precluded the need to have to send a Flight Cancellation message. Is it correct that there is an indicator within the Flight Close-Out Message that allows the carrier to tell you that the flight was cancelled?

Answer: The Flight Cancellation message was established to satisfy an industry request. If a carrier does not wish to test this functionality, it will not be expected. Carriers choosing to test a Flight Cancellation message should refer to the UN/EDIFACT Implementation guide, page 68 for the correct indicator in the BGM segment.

6. **Systems with multiple hosted carriers and certification process, does each hosted carrier need to get a separate certification or is it possible to certify the system used?**

Answer: CBP will work with each system to authorize the process they establish. It is strongly suggested each carrier using the authorized system complete testing with CBP as well. It will be a business decision, on the part of the carrier, if they choose not to test the authorized system.

Connections/Communications

1. How are messages communicated between DHS and air carriers?

Answer: Carriers deciding to utilize an interactive submission option will be expected to establish a dedicated connection that will be able to provide responses to carriers within seconds of submitting. Carriers choosing to utilize the interactive batch process may also establish a direct connection, to ensure timely responses.

2. Which network option provides the lowest latency?

Answer: MPLS will be the fastest transport of data, because you are directly connecting to CBP's Wide Area Network.

3. How much will a direct MPLS circuit cost?

Answer: Consult with Sprint and Verizon because costs are driven by a variety of factors that CBP does not have access to.

4. Which network option provides the most reliability?

Answer: It would depend on how an airline engineers their Wide Area Network to CBP. The highest reliability comes from eliminating single points that can cause total failure of the network connection.

5. What is the average time it will take to receive an AQQ response from CBP?

Answer: CBP has committed to a 4 seconds or less processing response time. End to end message delivery can be affected by many factors, outside the control of CBP.

6. What is considered satisfactory network communication? Can we submit for certification under AQQ so we are sure our infrastructure will also work for SF?

Answer: CBP will work with carriers and their systems to ensure the network connection selected is sufficient for the traffic expected for each carrier. As carriers and

their systems transition from one network connection to another, CBP and TSA will work diligently to ensure proper testing is performed.

7. We are expecting CBP's MQ Installation to be using Correlation ID. Please confirm. Can CBP provide Sabre DHS's MQ Specification document?

Answer: CBP will support correlation ID. It is expected each carrier will have a slightly unique MQ Series architecture. CBP will work with each carrier/DCS to define the correct one.

8. For disaster recovery, will DHS provide Sabre with a **second** router for our recovery location?

Answer: Acquisition of disaster recovery routers will be the responsibility of carriers or carrier systems.

9. **It appears that CBP does not want asynchronous connectivity, but rather synchronous, is that so?**

Answer: CBP will support both synchronous and asynchronous. CBP does not have preferences that they rank. CBP would prefer a direct (MQ) connection. CBP will support the current connections that exist today (Type B traffic), as well as asynchronous Type A and Type B, and MQ series. Final connection options to CBP are up to the carrier.

Regarding IATA HTH Type A, TPRs should not be the same. That means the connectivity established in an IATA HTH Type A will be asynchronous.