ORAL ARGUMENT NOT YET SCHEDULED
No. 16-1135
(Consolidated with No. 16-1139)

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

COMPETITIVE ENTERPRISE INSTITUTE,
THE RUTHERFORD INSTITUTE, IAIN MURRAY, and MARC SCRIBNER,

Petitioners,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY,
TRANSPORTATION SECURITY ADMINISTRATION, and JEH JOHNSON,
in his official capacity as Secretary of the U.S. Department of Homeland Security,

Respondents.

On Petition for Review of an
Order of the Department of Homeland Security

OPENING BRIEF OF PETITIONERS

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CERTIFICATE OF PARTIES, RULINGS, AND RELATED CASES

Pursuant to Circuit Rules 12(c) and 28(a)(1), Petitioners submit this certificate as to parties, rulings, and related cases:

Parties and *Amici* – This case involves the following parties:

Petitioners: Competitive Enterprise Institute; the Rutherford Institute; Iain Murray; and Marc Scribner. (In a case consolidated with this one, Case No. 16-1139, Electronic Privacy Information Center is the petitioner).

Respondents: The respondents are the United States Department of Homeland Security; the Transportation Security Administration; and Jeh Johnson, in his official capacity as Secretary of the United States Department of Homeland Security.

Intervenors: The Court has not granted any motions to intervene at this time, nor have any motions been filed.

Amici: The Court has not granted any motions to participate in this case as amicus curiae, nor have any motions been filed.

The Competitive Enterprise Institute is a non-profit 501(c)(3) corporation organized under the laws of the District of Columbia for the purpose of defending free enterprise, limited government, and the rule of law. It has no parent companies. No publicly held corporation has a 10 percent or greater ownership interest in it, or indeed, any interest in it at all. The Rutherford Institute is an

international nonprofit civil liberties organization that provides pro bono legal representation to individuals whose civil liberties are threatened and educates the public about constitutional and human rights. It has no parent companies. No publicly held company has a 10 percent or greater ownership interest in The Rutherford Institute.

Rulings Under Review – This is a challenge to a final rule of the United States Department of Homeland Security's Transportation Security Administration (TSA) entitled *Passenger Screening Using Advanced Imaging Technology*, 81 Fed. Reg. 11363 (March 3, 2016).

Related Cases – This case has been consolidated with a related case challenging the same TSA Final Order: *Electronic Privacy Information Center v. Transportation Security Administration, et al.*, D.C. Circuit Case No. 16-1139.

Respectfully submitted,

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RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure Rule 26.1 and Circuit Rule 26.1, Petitioners make the following disclosures: Competitive Enterprise Institute is a non-profit 501(c)(3) corporation organized under the laws of the District of Columbia for the purpose of defending free enterprise, limited government, and the rule of law. It has no parent companies. No publicly held corporation has a 10 percent or greater ownership interest in it.

The Rutherford Institute is an international nonprofit civil liberties organization that provides pro bono legal representation to individuals whose civil liberties are threatened and educates the public about constitutional and human rights. Incorporated in Virginia, it has no parent companies. No publicly held company has a 10 percent or greater ownership interest in it.

STATEMENT REGARDING DEFERRED APPENDIX

The parties have conferred and intend to use a deferred joint appendix.

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GLOSSARY

AIT	Advanced Imaging Technology
APA	Administrative Procedure Act
CEI	Competitive Enterprise Institute
DHS	United States Department of Homeland Security
EPIC	Electronic Privacy Information Center
FAA	Federal Aviation Administration
FMCSA	Federal Motor Carrier Safety Administration
FRIA	Final Regulatory Impact Analysis (full title: "Final Rule: Regulatory Impact Analysis and Final Regulatory Flexibility Analysis")
JA	Joint Appendix
NHTSA	National Highway Traffic Safety Administration
NPRM	Notice of Proposed Rulemaking
TSA	Transportation Security Administration
WTMD	Walk-through metal detector

JURISDICTIONAL STATEMENT

The Petition for Review is authorized by 49 U.S.C. § 46110(a), 6 U.S.C. § 203(2), and 5 U.S.C. § 702, because it is a challenge to a final order of the Transportation Security Administration (TSA), and was timely filed by Petitioners on May 2, 2016, within 60 days of TSA's order.[1] It challenges a final rule of the TSA entitled *Passenger Screening Using Advanced Imaging Technology,* 81 Fed. Reg. 11363 (March 3, 2016).

STANDARD OF REVIEW

A reviewing court may set aside an agency determination pursuant to 5 U.S.C. § 706(2) if it is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." "Normally, an agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, [or] offered an explanation for its decision that runs counter to the evidence before the agency." *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983). Although this Court may not simply "substitute its judgment" for the agency's, its review must "be searching and careful." *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 416 (1971).

[1] *See Corbett v. TSA*, 767 F.3d 1171, 1178 (11th Cir. 2014).

STATEMENT OF ISSUES

Whether TSA's Final Rule violates the Administrative Procedure Act in that, among other things, TSA arbitrarily and capriciously failed to adequately consider the extent to which its use of body scanners will induce airplane passengers to substitute car travel for flying, thus increasing overall transportation risks.

STATUTES AND REGULATIONS

The Addendum contains pertinent statutes and regulations.

STATEMENT OF THE CASE

At issue in this case is TSA's formal rule on the use of advanced imaging technology (AIT) to screen airline passengers. Final Rule, *Passenger Screening Using Advanced Imaging Technology,* 81 Fed. Reg. 11363 (Mar. 3, 2016). AIT scanners can detect concealed items under a person's clothes that may be missed by conventional walk-through metal detectors (WTMD). According to TSA, these scanners represent a major improvement in screening technology.

TSA issued its rule nine years after it first began using AIT, and the agency acted only after repeated lawsuits in this Court aimed at forcing it to go through rulemaking. As we will show, despite TSA's lengthy delays in issuing its rule, its action is still legally deficient.

The Litigation Leading up to TSA's Rule

More than nine years ago, in early 2007, TSA began deploying AIT scanners in U.S. airports to screen airline passengers.[2] Since then, nearly 800 of these full-body scanners have been installed in approximately 157 airports nationwide.[3]

In 2009 and 2010, the Electronic Privacy Information Center (EPIC, a petitioner in the case consolidated with this instant action) and a large number of other organizations twice petitioned the Secretary of Homeland Security—who oversees TSA—to conduct notice-and-comment rulemaking on the agency's use of AIT imaging.[4] Both of these requests were denied, and in 2010, EPIC filed a petition for review with this Court, arguing that TSA's use of AIT was unlawful under the Administrative Procedure Act (APA).[5] In 2011, this Court held that TSA had violated the APA, and remanded the matter to TSA with instructions to "promptly . . . proceed in a manner consistent with [this Court's] opinion."[6]

A year later, TSA had yet to publish a notice of proposed rulemaking. EPIC petitioned for a writ of mandamus in July 2012. The Court denied EPIC's petition

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[2] *EPIC v. DHS*, 653 F.3d 1, 3 (D.C. Cir. 2011).

[3] *Passenger Screening Using Advanced Imaging Technology*, 81 Fed. Reg. 11363, 11365 & 11378 (Mar. 3, 2016) (hereinafter Final Rule).

[4] *EPIC*, 653 F.3d at 4.

[5] *Id.* at 5.

[6] *Id.* at 11.

two months later, but emphasized that it expected TSA to publish a notice of proposed rulemaking "before the end of March 2013."[7] The agency fulfilled that deadline with only five days to spare.[8]

Four years after this Court's July 2011 mandate, and more than two years after TSA published its notice of proposed rulemaking, the agency had still not issued its final rule. For that reason, CEI, the National Center for Transgender Equality, the Rutherford Institute, and two individuals filed a petition for a writ of mandamus with this Court, seeking to force TSA to issue a final rule which would take into account the more than 5,000 comments submitted by the public in 2013.[9] On October 23, 2015, this Court ordered TSA to "submit to the court a schedule for the expeditious issuance of a final rule within a reasonable time."[10] In response, TSA committed to publish a final rule by March 3, 2016, and on that basis the Court denied the petition.[11]

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[7] *In re EPIC*, No. 12-1307 (D.C. Cir. Sept. 25, 2012) (per curiam) (internal quotations and citation omitted).

[8] NPRM, 78 Fed. Reg. at 18287 (published Mar. 26, 2013).

[9] Petition for a Writ of Mandamus to Enforce This Court's Mandate, *In re Competitive Enterprise Institute*, No. 15-1224 (D.C. Cir. July 15, 2015).

[10] Order, *In re Competitive Enterprise Institute*, No. 15-1224 (D.C. Cir. Oct. 23, 2015) (per curiam).

[11] *In re Competitive Enterprise Institute*, No. 15-1224 (D.C. Cir. Dec. 15, 2015) (per curiam).

On March 3, 2016, with not a day to spare, TSA published its final rule.[12]

The Final Rule

In its final rule, TSA amended its regulations regarding passenger "submission to screening and inspection" to provide that "screening and inspection . . . may include the use of advanced imaging technology." Final Rule, 81 Fed. Reg. at 11405 (codifying 49 C.F.R. § 1540.107(d)). Advanced imaging technology (AIT) is "a device used in the screening of passengers that creates a visual image of an individual showing the surface of the skin and revealing other objects on the body." 81 Fed. Reg. at 11405 (quoting 49 C.F.R. § 1540.107(d)(1)). AIT includes "devices referred to as whole body imaging technology or body scanning machines." *Id.*

TSA described AIT body scanners as "the most effective and least intrusive means currently available to detect both metallic and non-metallic threats concealed under a person's clothing." 81 Fed. Reg. at 11367. This was the main advantage of scanners over walk-through metal detectors (WTMD), which were limited to detecting only metallic threats. TSA characterized AIT as reducing the need for pat-downs (*id.* at 11393), and stated that privacy concerns regarding body scanners' production of naked body images had been eliminated through the use of

[12] Final Rule, 81 Fed. Reg. at 11363 (published on March 3, 2016).

new software that produced only a "generic outline" of a passenger's body. *Id*. at 11365. The agency included in its ruling a cost-benefit analysis that presented the monetary costs of AIT and a break-even assessment of AIT's deterrent effect on airplane attacks. *Id.* at 11367.

TSA did note the existence of public opposition to the devices due, among other things, to "privacy, health, cost, and civil liberties." *Id.* at 11367–68. It conceded that some commenters "said they limit their airline travel as much as possible because of AIT screening." *Id.* at 11368. And it noted the arguments of some individuals and organizations that, given the greater risks of driving compared to flying, this could raise a safety issue—"some estimated as many as 500 additional deaths per year." *Id*. at 11392.

Nonetheless, TSA stated that there was "no evidence" of a "non-negligible" number of passenger shifting to cars. *Id.* at 11398. And while TSA it doubted the relevance of the issue, *id.* at 11394, it nonetheless noted pointed out that the public shift *away* from air travel after 9/11 had also had lethal consequences due to increased road travel. *Final Rule: Regulatory Impact Analysis and Final Regulatory Flexibility Analysis*, at 132 (Feb. 18, 2016) ("FRIA").[13]

[13] Available at https://www.regulations.gov/document?D=TSA-2013-0004-5583.

SUMMARY OF ARGUMENT

Despite the length and detail of its Final Rule, TSA failed to seriously consider the extent to which its body scanners would lead people to drive rather than fly. That issue is literally a question of life and death, because travelling by car is significantly riskier than flying.

Comments from both analysts and private individuals squarely presented TSA with this issue. Many commenters pointed out that they had already reduced their air travel in favor of driving, for such reasons as privacy and airport screening hassles. Nonetheless, the agency summarily dismissed this as insignificant. But as the agency's own break-even analysis for the alleged life-saving potential of AIT demonstrates, the risks raised by a shift from planes to cars are at least as large, in magnitude, as the projected benefits of AIT. The agency cannot base its decision on one side of the equation while ignoring the other.

Moreover, the agency's characterization of the advantages of body scanners—their alleged effectiveness and unobtrusiveness—appear on closer scrutiny to be serious exaggerations. Many commenters, for example, strongly object to having to "assume the position" when they enter a scanner, as compared to simply walking through a metal detector. Others reported that, rather than experiencing fewer pat-downs after scanning, as TSA had promised, they instead experienced more. And most tellingly, TSA's expedited screening programs, such

as PreCheck, which are intended to provide an improved screening for select low-risk passengers, do not use the touted body scanners at all. Instead, they employ the same walk-through metal detectors that TSA now seeks to replace.

TSA may have hoped that its hyperbole would allow it to ignore public opposition to its scanners; this approach, however, is the epitome of capricious agency action.

For these reasons, TSA's rule should be remanded to the agency and it should be ordered to reexamine the issue of travelers substituting cars for planes.

STANDING

Petitioners' standing is explained in the attachment to their Agency Docketing Statement. For example, petitioners Murray and Scribner regularly travel as passengers on commercial airplanes (see their declarations in the attached Addendum on Standing), and thus have standing to challenge TSA's rule because they are subject to it whenever they fly. *State Nat. Bank of Big Spring v. Lew*, 795 F.3d 48, 55 (D.C. Cir. 2015) ("a regulated individual or entity has standing to challenge an allegedly illegal statute or rule under which it is regulated."). Moreover, AIT screening plainly impacts their "personal privacy" interests "directly and significantly." *EPIC v. DHS*, 653 F.3d 1, 6 (D.C. Cir. 2011).

ARGUMENT

TSA ARBITRARILY FAILED TO CONSIDER THE ISSUE OF WHETHER BODY SCANNERS WOULD CAUSE PASSENGERS TO SHIFT FROM FLYING TO DRIVING, THUS INCREASING TRAVEL RISKS.

I. The shift from planes to cars was squarely raised by the comments

TSA noted that "[m]any submissions included statements of opposition to the continued use of AIT. Of these, individual commenters expressed concerns pertaining to efficacy, privacy, health, cost, and civil liberties." Final Rule, 81 Fed. Reg. at 11367–68. TSA did not provide a breakdown of the comments received, but in fact the vast majority of comments were opposed; 94 percent, according to one analysis.[14]

Of those commenters opposed to AIT, a number noted that the use of AIT scanners would result in their flying less and driving more. As TSA itself stated, "commenters made statements regarding the impact of AIT screening on their travel choices. Many of these commenters indicated they no longer travel by air

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[14] *Public Comments on TSA Body Scanners Counted: 94.0% Opposed*, https://professional-troublemaker.com/2016/01/18/public-comments-on-tsa-body-scanners-counted-94-0-opposed/ (last visited Sept. 23, 2016) ("When all was counted and the comments that took no stance were removed, *5,129 people (94.0%) asked the TSA to discontinue its program … while 329 (6.0%) were in favor of continuing*.") (emphasis in original). The comments opposing AIT's continued use are listed in the Addendum of Opposing Comments.

because of the use of AIT. Some said they limit their airline travel as much as possible because of AIT screening." 81 Fed. Reg. at 11368, col. 1.

In total, over 80 commenters stated that they would drive more rather than fly due to AIT. As one commenter stated, "I was once a frequent traveler but have avoided airports whenever possible for the past four years, preferring a drive of several hours/days rather than be subjected to the unacceptable activities occurring at our airports today." Comment 2013-0004-4447, JA__.[15] In the words of another commenter, since the installation of scanners "I have avoided air travel altogether. For example, last year I drove nearly 6,000 miles on two separate trips to avoid being subjected to what clearly is a violation of privacy by this intrusive form of airport passenger inspection." Comment 5457, JA__.[16]

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[15] Comments to TSA's NPRM have ID numbers that begin with TSA-2013-0004, followed by a four-digit number. The URL at which each comment can be found in the electronic record consists of https://www.regulations.gov/document?D=TSA-2013-0004-[four digit number]. Thus, the comment quoted in the text above can be found at https://www.regulations.gov/document?D=TSA-2013-0004-4447. Comments cited below in this brief will be referred to by their four-digit number.

[16] Other comments making similar definitive statements about driving rather flying are: 0114, 0162, 0168, 0193, 0246, 0327, 0342, 0343, 0401, 0478, 0597, 0599, 0686, 0774, 0916, 1039, 1439, 1460, 1490, 1617, 1641, 1643, 1737, 1741, 1823, 1886, 1901, 1976, 2074, 2109, 2169, 2197, 2197, 2288, 2442, 2542, 2702, 2721, 2740, 2785, 2798, 3066, 3196, 3218, 3303, 3318, 3427, 3465, 3559, 3585, 3599, 3616, 3699, 3742, 3769, 3814, 3830, 3980, 4070 (see p. 20), 4086, 4103, 4120, 4172, 4226, 4265, 4414, 4488, 4553, 4562, 4565, 4576, 4662, 4827, 4962, 5188, 5221, 5327, 5467, 5529. *See* JA__.

Concerns over privacy were the chief factor mentioned in these comments.[17] Other factors cited were time, inconvenience and AIT health risks. A number of comments specifically cited the objectionable nature of what passengers must do inside the scanner. TSA describes it in relatively neutral terms: "Once inside, individuals are directed to stand with arms raised, and to remain still for several seconds while the image is created." *Passenger Screening Using Advanced Imaging Technology*, *Notice of Proposed Rulemaking*, 78 Fed. Reg. 18287, 18297 (Mar. 26, 2013) ("NPRM"). But to many commenters, this means "assuming the position" of someone under arrest: "I am an elite plus flyer with Delta and am angered as an American every time I go through security. Here, I see my fellow

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These 79 comments, together with the two comments quoted in the text, constitute approximately 1.5 percent of the total comments (pro and con) filed with TSA.

All of the above commenters clearly stated that they had actually reduced their flying and were driving instead, or that they planned to do so. There were other commenters, not included in the above list, who made similar but less definitive statements about changing their travel modes. *See, e.g.*, Comment 4226, JA__ (obtrusiveness of having to "assume the position" in an AIT scanner "certainly makes road trips a lot more enticing, even though that means renting a car for me.")

[17] *See, e.g.*, Comments 0114, 0193, 0246, 0342, 0343, 0401, 0478, 0599, 0774, 0916, 1039, 1460, 1490, 1617, 1643, 1737, 1741, 1901, 2074, 2197, 2197, 2542, 2721, 2740, 2785, 2798, 3066, 3196, 3218, 3303, 3308, 3427, 3465, 3559, 3585, 3616, 3742, 3814, 3830, 4070 (see p. 20), 4172, 4226, 4265, 4414, 4447, 4488, 4562, 4565, 4576, 4662, 4827, 4962, 5188, 5221, 5327, 5457, 5467, 5529, JA__.

citizens 'assume the position' as if they are criminals in order to access transportation." Comment 0596, JA__.[18]

The fact that these and other aspects of AIT would cause some segment of the public to switch from flying to driving raised the clear possibility that this technology was creating a safety issue, because driving is significantly riskier than flying. The need for TSA to take this risk into account was expressly raised by a number of commenters. *See* below, notes 19-20 and accompanying text. In TSA's words:

> Many commenters, including non-profit organizations, an advocacy group, and individual commenters stated that the traveling public would avoid air travel, causing individuals to drive or take the train. Some of these commenters stated that there would be increased roadway fatalities because of the increase in motor vehicle travel (some estimated as many as 500 additional deaths per year). The commenters suggested that the analysis should account for the cost associated with these additional fatalities.

81 Fed. Reg. at 11363.

For example, three analysts filed comments noting that:

> Security measures that travelers perceive as harassing can cause them to avoid air travel entirely, taking alternative methods of transportation that are

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[18] *See also* Comment 0279, JA__ ("As an American citizen, I am deeply offended each time I and my family members are required to stand, in a straddled position, with arms in the air and hands overhead, for screening our entire bodies each time we fly."); Comments 2404 & 2390, pg. 1, JA__ ("Standing in the machine with one's arms in the surrender position is, in its own way, just a [sic] degrading as a patdown.").

> more dangerous instead. One study has concluded, for example, that such harassment has helped lead to a pronounced decline in short-haul flying since 2001, with the result that approximately 500 more Americans die each year than otherwise would because they travel by automobile, a far more dangerous mode of transportation.[19]

Similarly, the former CEO of American Airlines, Robert Crandall, and petitioner CEI argued in their joint comments that "the invasiveness" of AIT scanners and related security procedures "are likely causing potential flyers to take to the far more deadly roads, which has led to an estimated 500 additional annual road fatalities due to this modal substitution."[20]

TSA does not contest the deadly nature of switching from flying to driving. To the contrary, TSA *itself* noted another example of this switch; in the wake of the 9/11 attacks, there was a significant switch from flying to driving by the public, possibly resulting in "at least 1,200 additional driving deaths." FRIA at 132 (citation omitted).

Yet, as shown below, TSA simply failed to seriously consider whether AIT would cause some travelers to switch from flying to driving. It avoided the issue

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[19] *See* Comments of Jim Harper, John Mueller & Matt Stewart of the Cato Institute, Comment 4920, at 25–26, JA__ (quoting Garrick Blalock, Vrinda Kadiyali & Daniel H. Simon, *The Impact of Post-9/11 Airport Security Measures on the Demand for Air Travel*, 50 J.L. & Econ. 731 (2007)).

[20] Comments of CEI and Robert L. Crandall, Comment 4239, at 7–8, JA__ (citations omitted), https://www.regulations.gov/document?D=TSA-2013-0004-4239.

through a combination of dismissive pronouncements, invalid math, and a faulty portrayal of AIT as a totally unintrusive screening technology to which passengers would not object.

II. TSA's dismissal of the fly-drive risk tradeoff as irrelevant does not withstand scrutiny

TSA dismissed the fly-drive tradeoff as an irrelevant factor:

> It is unclear to TSA how the risk associated with motor vehicles should influence TSA's decision making on airport screening practices. Regardless of the safety or security risks associated with other modes of transportation, TSA should pursue the most effective security measures reasonably available so that the vulnerability of commercial air travel to terrorist attacks is reduced.

81 Fed. Reg. at 11394. But an agency acts arbitrarily and capriciously when it ignores "harms that" its rule "might do to human health." *Michigan v. EPA*, 135 S. Ct. 2699, 2707 (2015).

TSA's ignoring of the fly-drive tradeoff is further demonstrated in its cost-benefit analysis. TSA considered security delays as a cost and attempted to quantify them. However, it nowhere evaluated the possibility that the prospect of these delays might lead some potential passengers to drive rather than fly, thus putting themselves at higher risk. For example, in TSA's analysis of "Annualized Passenger Costs," "Delay Costs" are evaluated only in terms of passenger opportunity costs, with no consideration given to the higher risk of substituted car travel. *See* 81 Fed. Reg. at 11367, Table 1.

Worse yet, while privacy objections were cited by many commenters as a factor in their switching to cars, privacy is totally absent from TSA's cost analysis. *See* FRIA at 104, Table 50. In fact, while TSA admits that WTMD creates "no additional perceived privacy concerns," it fails to even acknowledge that AIT created any privacy issues at all. *See* 81 Fed. Reg. at 11403, Table 8, "Advantages and Disadvantages of Regulatory Alternatives." That table contains absolutely no mention of privacy factors as a disadvantage of AIT. *See also* Tables 3-4, *id*. at 11400.

TSA expressly admitted that it "was unable to quantify a dollar valued for the perceived loss of privacy" and "was unable to produce a quantitative impact of perceived privacy issues." *Id.* at 11397. But as the Ninth Circuit has noted, refusing to assign a weight or "dollar value" to a factor in cost-benefit analysis is the same as giving it "zero value." *Center for Biological Diversity v. NHTSA*, 538 F.3d 1172, 1198, 1200 (9th Cir. 2008); *see also Pub. Citizen v. Fed. Motor Carrier Safety Admin.*, 374 F.3d 1209, 1218–19 (D.C. Cir. 2004) ("The mere fact that the magnitude of [a cost] is uncertain is no justification for disregarding the effect entirely."). Since privacy concerns were the most cited reason by commenters

discussing their reasons for shifting to cars, TSA's failure in this regard further enabled it to arbitrarily avoid the issue. *See* above, page 11 and note 17.[22]

TSA claimed that there was no measurable decline in air travel and no measurable increase in road travel; in its view, this is apparently a precondition for a demonstrable fly-drive tradeoff. For example, it stated that "[t]here is no evidence that use of AIT to screen passengers will have a non-negligible impact on motor vehicle travel." 81 Fed. Reg. at 11398. And it similarly claimed that it "was unable to find empirical evidence that air travel is reduced due to AIT." *Id.* at 11368.

But TSA here is ignoring the scores of comments from people who have switched from flying to driving, or who are planning such a switch. Absent an observable drop in overall air travel statistics, there is supposedly no issue. But TSA's obligation to consider the lethal effects of its rule is not excused by the lack of statistical certainty in determining them. As this Court observed in *CEI v. NHTSA*, 956 F.2d 321 (D.C. Cir. 1992), the fact that "the number of people

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[22] In fact, privacy appears to be the most dominant issue overall for the public regarding AIT. "[R]espondents in a 2010 survey identified privacy more than twice as often as delay as a primary concern with AIT." Transgender Law Center, Comment 4203, at 2, JA__ (citing Bart Elias, U.S. Congressional Research Service, *Airport Body Scanners: The Role of Advanced Imaging Technology in Airline Passenger Screening* (7-5700; Sept. 12, 2012), *available at* http://www.law.umaryland.edu/marshall/crsreports/crsdocuments/r42750_09202012.pdf).

sacrificed [due to an agency's rule] is uncertain" is not a basis for an agency declining to "conduct a serious analysis" of the issue. The agency must "confront the issue," not refuse to investigate it, and it must "exercise [its] discretion" in weighing any safety trade-offs, not assume them away. *Id.* at 327.

In the absence of such an analysis, TSA cannot rely on an alleged lack of evidence either way.[23] But this is exactly what TSA did here in claiming that "there is no evidence that use of AIT to screen passengers will have a non-negligible impact on motor vehicle travel." 81 Fed. Reg. at 11397–98. Such a conclusory assertion is insufficient to meet the agency's burden. This sort of attempt "to paper over the need to make a call" is "decisional evasion" and is entitled to no deference. *CEI v. NHTSA*, 956 F.2d 321, 323 (D.C. Cir. 1992).

TSA needed to point to something "in the record" to "undermine the inference" that the comments from travelers who were switching from planes to cars indicated the presence of a safety risk. It could not just claim, *ipse dixit*, that there was a lack of evidence on this point. *Cf. CEI*, 956 F.2d at 327.

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[23] *Compare NHTSA, Passenger Automobile Average Fuel Economy Standard for Model Year 1990,* 54 Fed. Reg. 21985, 21993, 1998 WL 270275 (May 22, 1989) (agency claimed that "there is no evidence demonstrating adverse safety consequences that would be associated with retaining the 27.5 mpg standard in MY 1990"), *vacated*, *CEI v. NHTSA*, 956 F.2d 321 (D.C. Cir. 1992) (vacating agency's action where "Nothing in the record or in NHTSA's analysis appears to undermine the inference that the 27.5 mpg standard kills people").

III. The small number of lives supposedly saved by body scanners in TSA's breakeven analysis squarely contradicts TSA's dismissal of the fly-drive risk.

As previously shown at pages 10 to 13 above, the record contains clear evidence that AIT was causing a sizable number of people to shift from flying to driving—a fact that TSA itself conceded: "Many commenters made statements regarding the impact of AIT screening on their travel choices. Many of these commenters indicated they no longer travel by air because of the use of AIT. Some said they limit their airline travel as much as possible because of AIT screening." 81 Fed. Reg. 11368.

The implications of these comments for nationwide travel decisions warranted analysis by TSA even if, as the agency claimed, they reflected a "negligible" fraction of all travelers. This is because TSA's own analysis attempts to justify AIT screening on the basis that it may save as few as 21 air passenger lives per year. FRIA at 138 (*Frequency of Attacks Averted to Break-Even for AIT*, Table 57). That life-saving potential is important, even though it is statistically miniscule compared to the number of people who travel by air each year. Yet as discussed immediately below, it is for this very same reason that the lethal risks of a fly-drive shift cannot be dismissed as "negligible."

As discussed above at note 16, 1.5 percent of all commenters said they would opt to drive rather than fly due to AIT scanners. If that percentage is

representative of air passengers in general, it would mean that AIT reduced annual enplanements by approximately 12,251,000—that is, 1.5 percent of total enplanements.[24] Due to the disparate risk between plane and car travel, however, reductions in enplanements are associated with increases in road fatalities. As one study found, "a decrease of 1 million enplanements leads to an increase of 15 driving-related fatalities."[25]

If this ratio is applied to the above drop in enplanements, it suggests that 184 additional road deaths would occur yearly due to the rule.

Of course, the commenters who participated in TSA's rulemaking may not be representative of airline passengers overall. However, even if they are overrepresented by a factor of eight, this still would result in 24 road-related deaths, a figure that is larger than the 20 to 21 lives claimed by TSA in its break-even analysis.[26]

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[24] From June 2015 to May 2016, there were 816,763,000 total passenger enplanements. U.S. Department of Transportation, Air Carrier Traffic Statistics Through May 2016, http://www.rita.dot.gov/bts/acts. One and one-half percent of these enplanements is 12,251,445.

[25] Blalock, *supra* note 19, at 752. TSA relies upon a similar study by Blalock when it discusses the additional road deaths that resulted from the public's avoidance of plane travel in the wake of 9/11. *See* FRIA at 133 n.187.

[26] TSA's break-even analysis does not provide express figures for the number of lives saved annually due to AIT's deterrence of terrorism. But those figures can be quickly calculated from the figures in TSA's "Frequency of Attacks Averted to Break-Even for AIT," Table 57, FRIA at 138. Simply take the "total passengers + crew" figure for each aircraft model, multiply it by the load factor,

In short, TSA's dismissal of the fly/ride tradeoff as "not significant" is simply false; to the contrary, it is at least as significant as the results of the agency's break-even calculations.

IV. TSA's claims regarding the alleged virtues of its body scanners are belied by a number of factors, most importantly the agency's use of metal detectors in its special screening programs

TSA repeatedly touts the virtues of AIT, claiming that "AIT is the most effective technology currently available to detect both metallic and non-metallic threat items concealed on passengers … ." 81 Fed. Reg. at 11365; *see also id*. at 11375 & 11378. In fact, according to TSA, AIT is not only the most effective screening technology, it is also the most unobtrusive—"the least intrusive means currently available to detect both metallic and non-metallic threats concealed under a person's clothing." *Id.* at 11367. TSA claims that AIT "reduces the need for a pat-down, which would be required with the WTMD for individuals with medical implants such as a pacemaker or a metal knee replacement. Thus, AIT reduces the cost and inconvenience to passengers with this medical equipment." *Id.* at 11393.

But TSA ignored several factors in this rosy description of AIT. First, there is the issue of speed. TSA admits that scanners are slower than metal detectors, but it claims that scanners do not increase overall screening time because the real time

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and then divide by the number of years per attack. The results for all five scenarios fall in the same range: 20 to 21 lives per year.

constraint is the screening of checked baggage. "Overall passenger screening system times do not increase with AIT. … Although the AIT … throughput rate is *lower* than with WTMD, the passenger screening system and passengers are constrained by the x-ray machines that screen carry-on baggage and personal belongings." 81 Fed. Reg. at 11391.

But this ignores the fact that, in at least some situations, *AIT scanning will slow things down*. For example, TSA's FRIA explains, in a somewhat complicated manner, that the number of x-ray machines in a given location for screening carry-on baggage can be increased.[27] In that case, carry-on baggage screening no longer is the limiting factor on screening speed, and the comparative slowness of AIT scanners may well increase screening time.[28] Indeed, there is evidence in the record that at least one country, Italy, stopped using AITs due to their slowness.[29]

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[27] FRIA at 62–63 (*available at* https://www.regulations.gov/document?D=TSA-2013-0004-5583).

[28] In a configuration involving "two x-ray machines, TSA co-locates the AIT with a WTMD to maintain the throughput of 300 passengers per hour because an AIT unit alone may not be able to handle this throughput." FRIA at 62–63. In short, the slower scanner needs help from the metal detector in order to keep up with passenger flow.

[29] "After a six-month test, Italy's government will drop the use of full-body scanners…, judging them slow and ineffective …." National Association of Airline Passengers, Comment 5201 at 8, JA__, https://www.regulations.gov/document?D=TSA-2013-0004-5201.

Second, TSA's claim that AIT reduces pat-downs is highly questionable. A number of commenters complained of how AIT screening forced them to undergo more pat-downs than they had ever received from WTMDs; in one commenter's words, AIT scanners are "no more than million dollar random pat-down generators." Comment 4903, JA__.[30] Outside press reports confirm the persistence of pat-downs as a common phenomenon following AIT screening.[31]

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[30] *See also, e.g.*, Comment 4025, JA__ ("I have experienced a 66 percent false positive rate with the Millimeter Wave AIT's ATD software. . . . despite the fact that I followed the TSA's instructions and divested everything from my body as instructed, two-thirds of the time the ATD software still alarmed . . .This means that I had to receive a pat-down despite the fact that I did not pose a threat to aviation security. Had I used the WTMD, I would not have alarmed since I had removed all metal objects from my body and the WTMD does not experience the same issue with false positives like the AIT's ATD software does."); Comment 5424, JA__ ("Because Nude Body Scanners detect surface objects, but not their nature, persons with objects on their body are subjected to invasive secondary screens. Objects include prosthetic breasts, ostomies, bandages, maxipads, and adult diapers, among others . . . False positives are common"); Comment 0193, JA__ ("These AIT machines produce false positives 54% of the time, requiring a follow-up pat-down."); Comments 0644, 4519, 4619, 4626, 4662, 4823, 4903, JA__.

[31] Ashley Halsey III, *Holiday Worsens Air-Travel Backups*, Wash. Post, May 30, 2016, at A1 ("Those full-body scanners that passengers enter and then raise their arms are not metal detectors. They will pick up almost anything other than clothing, and whatever they find will require a pat-down, which slows the line.") (available in Westlaw at 2016 WLNR 16488916); Gulliver, *For American flyers, this year is likely to be even more miserable than the last*, The Economist, Jan. 7, 2016 ("many people who agree to the scan are still subjected to pat-downs.") (available in Westlaw).

Third, TSA totally avoids acknowledging the "assume the position" aspect of AIT scanners to which so many commenters objected. *See* note 17 and accompanying text.

But perhaps the best evidence against TSA's characterizations of AIT is this fact—AIT scanners are conspicuously *absent* from the two expedited screening programs that TSA has instituted for certain categories of passengers. This contradicts TSA's claim that AIT does not slow down passenger screening. *See Business Roundtable v. SEC*, 647 F.3d 1144, 1148–49 (D.C. Cir. 2011) (agency acted illegally where it "contradicted itself" using reasoning that was "internally inconsistent and therefore arbitrary").

One of these TSA programs is "for passengers under the age of 12 and those 75 and older to expedite screening and reduce the need for a pat-down to resolve alarms." 81 Fed. Reg. at 11368. The other program is PreCheck, which "increases passenger throughput at the security checkpoint and improves the screening experience of frequent, trusted travelers." *Id.*[32]

[32] Federal judges, members of Congress, and certain other categories of passengers are automatically included in PreCheck. TSA, *Privacy Impact Assessment for the PreCheck Application Program*, at 2 (2013), https://www.dhs.gov/sites/default/files/publications/privacy-pia-tsa-precheck-09042013_0.pdf (last visited, Sept. 26, 2016).

Given the advantages that TSA claims for AIT, one would think it would be the technology of choice for these programs.

In fact, it isn't. The details are found only in the footnotes of the Final Rule, but it turns out that both programs use not AIT, but walk-through metal detectors. In the "expedited screening" program for the young and elderly, passengers "are screened primarily by the Walk-Through Metal Detector." 81 Fed. Reg. at 11368 n.11. Similarly, in PreCheck, TSA uses WTMD rather than AIT to achieve its goal of "more limited screening burdens on passengers." *Id.* at n.13.

In short, metal detectors rather than body scanners are TSA's tools of choice when quick and convenient screening is the goal. Despite TSA's claims to the contrary, body scanners are often slow, obtrusive and inconvenient, and these are additional reasons why some people, faced with the prospect of AIT screening, will choose to drive rather than fly.

CONCLUSION

As shown above, TSA failed to adequately consider the fly-drive issue. It ignored the evidence that many people found body scanners to be offensive and intrusive, and that this and other factors were leading them to shift from planes to cars. It dismissed the magnitude of the risk posed by such travel decisions, despite the fact that its own break-even analysis rested on a similar numerical basis. It failed to examine how the privacy concerns raised by AIT would lead people to

choose not to fly. And despite its high praise for body scanners, TSA avoided using them for its own preferred-traveler screening programs, turning instead to the much-maligned metal detectors.

For these reasons, and for the other reasons set forth above, TSA's body scanner rule should be remanded so that the agency can properly assess the fly-drive question.

Respectfully submitted this 26th day of September, 2016,

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CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 32(a)(7)(C), I certify that:

This brief complies with the type-volume limitation of Rule 32(a)(7)(B) of the Federal Rules of Appellate Procedure, because this brief contains 5,953 words, excluding the parts of the brief exempted by Rule 32(a)(7)(B)(iii) of the Federal Rules of Appellate Procedure and Circuit Rule 32(a)(1).

This brief complies with the typeface requirements of Rule 32(a)(5) of the Federal Rules of Appellate Procedure and the type-style requirements of Rule 32(a)(6) of the Federal Rules of Appellate Procedure because this brief has been prepared in a proportionately spaced typeface using the 2010 version of Microsoft Word in fourteen-point Times New Roman font.

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CERTIFICATE OF SERVICE

I certify that on this 26th day of September 2016, I filed the foregoing brief with the Court. I further certify that on this 26th day of September 2016, I served the foregoing brief on all counsel of record through the Court's CM/ECF system.

Respondent's counsel, who have appeared, will be automatically served by the CM/ECF system, as will petitioners' counsel in the consolidated case, including:

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STATUTORY ADDENDUM

Statutes and Regulations

49 U.S. Code § 40113 – Administrative

(a) General Authority.—

The Secretary of Transportation (or the Under Secretary of Transportation for Security with respect to security duties and powers designated to be carried out by the Under Secretary or the Administrator of the Federal Aviation Administration with respect to aviation safety duties and powers designated to be carried out by the Administrator) may take action the Secretary, Under Secretary, or Administrator, as appropriate, considers necessary to carry out this part, including conducting investigations, prescribing regulations, standards, and procedures, and issuing orders.

(b) Hazardous Material.—

In carrying out this part, the Secretary has the same authority to regulate the transportation of hazardous material by air that the Secretary has under section 5103 of this title. However, this subsection does not prohibit or regulate the transportation of a firearm (as defined in section 232 of title 18) or ammunition for a firearm, when transported by an individual for personal use.

[Subsections (c)-(f) omitted]

49 U.S. Code § 44901 - Screening passengers and property

(a) In General.—

The Under Secretary of Transportation for Security shall provide for the screening of all passengers and property, including United States mail, cargo, carry-on and checked baggage, and other articles, that will be carried aboard a passenger aircraft operated by an air carrier or foreign air carrier in air transportation or intrastate air transportation. In the case of flights and flight segments originating in the United States, the screening shall take place before boarding and shall be carried out by a Federal Government employee (as defined in section 2105 of title 5, United States Code), except as otherwise provided in section 44919 or 44920 and except for identifying passengers and baggage for

screening under the CAPPS and known shipper programs and conducting positive bag-match programs.

(b) Supervision of Screening.—

All screening of passengers and property at airports in the United States where screening is required under this section shall be supervised by uniformed Federal personnel of the Transportation Security Administration who shall have the power to order the dismissal of any individual performing such screening.

(c) Checked Baggage.—

A system must be in operation to screen all checked baggage at all airports in the United States as soon as practicable but not later than the 60th day following the date of enactment of the Aviation and Transportation Security Act.

(d) Explosives Detection Systems.—

(1) In general.—The Under Secretary of Transportation for Security shall take all necessary action to ensure that—

(A) explosives detection systems are deployed as soon as possible to ensure that all United States airports described in section 44903(c) have sufficient explosives detection systems to screen all checked baggage no later than December 31, 2002, and that as soon as such systems are in place at an airport, all checked baggage at the airport is screened by those systems; and

(B) all systems deployed under subparagraph (A) are fully utilized; and

(C) if explosives detection equipment at an airport is unavailable, all checked baggage is screened by an alternative means.

(2) Deadline.—

(A) In general.—If, in his discretion or at the request of an airport, the Under Secretary of Transportation for Security determines that the Transportation Security Administration is not able to deploy explosives detection systems required to be deployed under paragraph (1) at all airports where explosives detection systems are required by December 31, 2002, then with respect to each airport for which the Under Secretary makes that determination—

(i) the Under Secretary shall submit to the Senate Committee on Commerce, Science, and Transportation and the House of Representatives Committee on Transportation and Infrastructure a detailed plan (which may be submitted in classified form) for the deployment of the number of explosives detection systems at that airport necessary to meet the requirements of paragraph (1) as soon as practicable at that airport but in no event later than December 31, 2003; and

(ii) the Under Secretary shall take all necessary action to ensure that alternative means of screening all checked baggage is implemented until the requirements of paragraph (1) have been met.

(B) Criteria for determination.—In making a determination under subparagraph (A), the Under Secretary shall take into account—

(i) the nature and extent of the required modifications to the airport's terminal buildings, and the technical, engineering, design and construction issues;

(ii) the need to ensure that such installations and modifications are effective; and

(iii) the feasibility and cost-effectiveness of deploying explosives detection systems in the baggage sorting area or other non-public area rather than the lobby of an airport terminal building.

(C) Response.—

The Under Secretary shall respond to the request of an airport under subparagraph (A) within 14 days of receiving the request. A denial of request shall create no right of appeal or judicial review.

(D) Airport effort required.—Each airport with respect to which the Under Secretary makes a determination under subparagraph (A) shall—

(i) cooperate fully with the Transportation Security Administration with respect to screening checked baggage and changes to accommodate explosives detection systems; and

(ii) make security projects a priority for the obligation or expenditure of funds made available under chapter 417 or 471 until explosives detection systems required to be deployed under paragraph (1) have been deployed at that airport.

(3) Reports.—

Until the Transportation Security Administration has met the requirements of paragraph (1), the Under Secretary shall submit a classified report every 30 days after the date of enactment of this Act to the Senate Committee on Commerce, Science, and Transportation and the House of Representatives Committee on Transportation and Infrastructure describing the progress made toward meeting such requirements at each airport.

(4) Preclearance airports.—

(A) In general.—

For a flight or flight segment originating at an airport outside the United States and traveling to the United States with respect to which checked baggage has been screened in accordance with an aviation security preclearance agreement between the United States and the country in which such airport is located, the Assistant Secretary (Transportation Security Administration) may, in coordination with U.S. Customs and Border Protection, determine whether such baggage must be re-screened in the United States by an explosives detection system before such baggage continues on any additional flight or flight segment.

(B)Aviation security preclearance agreement defined.—

In this paragraph, the term "aviation security preclearance agreement" means an agreement that delineates and implements security standards and protocols that are determined by the Assistant Secretary, in coordination with U.S. Customs and Border Protection, to be comparable to those of the United States and therefore sufficiently effective to enable passengers to deplane into sterile areas of airports in the United States.

(C) Rescreening requirement.—

If the Administrator of the Transportation Security Administration determines that the government of a foreign country has not maintained security standards and protocols comparable to those of the United States at airports at which preclearance operations have been established in accordance with this paragraph, the Administrator shall ensure that Transportation Security Administration personnel rescreen passengers arriving from such airports and their

property in the United States before such passengers are permitted into sterile areas of airports in the United States.

(D) Report.—The Assistant Secretary shall submit to the Committee on Homeland Security of the House of Representatives, the Committee on Commerce, Science, and Transportation of the Senate, and the Committee on Homeland Security and Governmental Affairs of the Senate an annual report on the re-screening of baggage under this paragraph. Each such report shall include the following for the year covered by the report:

(i) A list of airports outside the United States from which a flight or flight segment traveled to the United States for which the Assistant Secretary determined, in accordance with the authority under subparagraph (A), that checked baggage was not required to be re-screened in the United States by an explosives detection system before such baggage continued on an additional flight or flight segment.

(ii) The amount of Federal savings generated from the exercise of such authority.

(e) Mandatory Screening Where EDS Not Yet Available.—As soon as practicable but not later than the 60th day following the date of enactment of the Aviation and Transportation Security Act and until the requirements of subsection (b)(1)(A) are met, the Under Secretary shall require alternative means for screening any piece of checked baggage that is not screened by an explosives detection system. Such alternative means may include 1 or more of the following:

(1) A bag-match program that ensures that no checked baggage is placed aboard an aircraft unless the passenger who checked the baggage is aboard the aircraft.

(2) Manual search.

(3) Search by canine explosives detection units in combination with other means.

(4) Other means or technology approved by the Under Secretary.

(f) Cargo Deadline.—

A system must be in operation to screen, inspect, or otherwise ensure the security of all cargo that is to be transported in all-cargo aircraft in air transportation and intrastate air transportation as soon as practicable after the date of enactment of the Aviation and Transportation Security Act.

(g) Air Cargo on Passenger Aircraft.—

(1) In general.—

Not later than 3 years after the date of enactment of the Implementing Recommendations of the 9/11 Commission Act of 2007, the Secretary of Homeland Security shall establish a system to screen 100 percent of cargo transported on passenger aircraft operated by an air carrier or foreign air carrier in air transportation or intrastate air transportation to ensure the security of all such passenger aircraft carrying cargo.

(2) Minimum standards.—The system referred to in paragraph (1) shall require, at a minimum, that equipment, technology, procedures, personnel, or other methods approved by the Administrator of the Transportation Security Administration, are used to screen cargo carried on passenger aircraft described in paragraph (1) to provide a level of security commensurate with the level of security for the screening of passenger checked baggage as follows:

(A) 50 percent of such cargo is so screened not later than 18 months after the date of enactment of the Implementing Recommendations of the 9/11 Commission Act of 2007.

(B) 100 percent of such cargo is so screened not later than 3 years after such date of enactment.

(3) Regulations.—

(A) Interim final rule.—

The Secretary of Homeland Security may issue an interim final rule as a temporary regulation to implement this subsection without regard to the provisions of chapter 5 of title 5.

(B) Final rule.—

(i) In general.—

If the Secretary issues an interim final rule under subparagraph (A), the Secretary shall issue, not later than one year after the effective date of the interim final rule, a final rule as a permanent regulation to implement this subsection in accordance with the provisions of chapter 5 of title 5.

(ii) Failure to act.—

If the Secretary does not issue a final rule in accordance with clause (i) on or before the last day of the one-year period referred to in clause (i), the Secretary shall submit to the Committee on Homeland Security of the House of Representatives, Committee on Commerce, Science, and Transportation of the Senate, and the Committee on Homeland Security and Governmental Affairs of the Senate a report explaining why the final rule was not timely issued and providing an estimate of the earliest date on which the final rule will be issued. The Secretary shall submit the first such report within 10 days after such last day and submit a report to the Committees containing updated information every 30 days thereafter until the final rule is issued.

(iii) Superceding [1] of interim final rule.—

The final rule issued in accordance with this subparagraph shall supersede the interim final rule issued under subparagraph (A).

(4) Report.—

Not later than 1 year after the date of establishment of the system under paragraph (1), the Secretary shall submit to the Committees referred to in paragraph (3)(B)(ii) a report that describes the system.

(5) Screening defined.—

In this subsection the term “screening” means a physical examination or non-intrusive methods of assessing whether cargo poses a threat to transportation security. Methods of screening include x-ray systems, explosives detection systems, explosives trace detection, explosives detection canine teams certified by the Transportation Security Administration, or a physical search together with manifest verification. The Administrator may approve additional methods to ensure that the cargo does not pose a threat to transportation security and to assist

in meeting the requirements of this subsection. Such additional cargo screening methods shall not include solely performing a review of information about the contents of cargo or verifying the identity of a shipper of the cargo that is not performed in conjunction with other security methods authorized under this subsection, including whether a known shipper is registered in the known shipper database. Such additional cargo screening methods may include a program to certify the security methods used by shippers pursuant to paragraphs (1) and (2) and alternative screening methods pursuant to exemptions referred to in subsection (b) of section 1602 of the Implementing Recommendations of the 9/11 Commission Act of 2007.

(h) Deployment of Armed Personnel.—

(1) In general.—

The Under Secretary shall order the deployment of law enforcement personnel authorized to carry firearms at each airport security screening location to ensure passenger safety and national security.

(2) Minimum requirements.—

Except at airports required to enter into agreements under subsection (c), the Under Secretary shall order the deployment of at least 1 law enforcement officer at each airport security screening location. At the 100 largest airports in the United States, in terms of annual passenger enplanements for the most recent calendar year for which data are available, the Under Secretary shall order the deployment of additional law enforcement personnel at airport security screening locations if the Under Secretary determines that the additional deployment is necessary to ensure passenger safety and national security.

(i) Exemptions and Advising Congress on Regulations.—The Under Secretary—

(1) may exempt from this section air transportation operations, except scheduled passenger operations of an air carrier providing air transportation under a certificate issued under section 41102 of this title or a permit issued under section 41302 of this title; and

(2) shall advise Congress of a regulation to be prescribed under this section at least 30 days before the effective date of the regulation, unless the Under Secretary decides an emergency exists requiring the regulation to become effective in fewer than 30 days and notifies Congress of that decision.

(j) Blast-Resistant Cargo Containers.—

(1) In general.—Before January 1, 2008, the Administrator of the Transportation Security Administration shall—

(A) evaluate the results of the blast-resistant cargo container pilot program that was initiated before the date of enactment of this subsection; and

(B) prepare and distribute through the Aviation Security Advisory Committee to the appropriate Committees of Congress and air carriers a report on that evaluation which may contain nonclassified and classified sections.

(2) Acquisition, maintenance, and replacement.—Upon completion and consistent with the results of the evaluation that paragraph (1)(A) requires, the Administrator shall—

(A) develop and implement a program, as the Administrator determines appropriate, to acquire, maintain, and replace blast-resistant cargo containers;

(B) pay for the program; and

(C) make available blast-resistant cargo containers to air carriers pursuant to paragraph (3).

(3) Distribution to air carriers.—

The Administrator shall make available, beginning not later than July 1, 2008, blast-resistant cargo containers to air carriers for use on a risk managed basis as determined by the Administrator.

(k) General Aviation Airport Security Program.—

(1)In general.—Not later than one year after the date of enactment of this subsection, the Administrator of the Transportation Security Administration shall—

(A) develop a standardized threat and vulnerability assessment program for general aviation airports (as defined in section 47134(m)); and

(B) implement a program to perform such assessments on a risk-managed basis at general aviation airports.

(2) Grant program.—

Not later than 6 months after the date of enactment of this subsection, the Administrator shall initiate and complete a study of the feasibility of a program, based on a risk-managed approach, to provide grants to operators of general aviation airports (as defined in section 47134(m)) for projects to upgrade security at such airports. If the Administrator determines that such a program is feasible, the Administrator shall establish such a program.

(3) Application to general aviation aircraft.—Not later than 180 days after the date of enactment of this subsection, the Administrator shall develop a risk-based system under which—

(A) general aviation aircraft, as identified by the Administrator, in coordination with the Administrator of the Federal Aviation Administration, are required to submit passenger information and advance notification requirements for United States Customs and Border Protection before entering United States airspace; and

(B) such information is checked against appropriate databases.

(4) Authorization of appropriations.—

There are authorized to be appropriated to the Administrator of the Transportation Security Administration such sums as may be necessary to carry out paragraphs (2) and (3).

(l) Limitations on Use of Advanced Imaging Technology for Screening Passengers.—

(1) Definitions.—In this subsection, the following definitions apply:

(A) Advanced imaging technology.—The term "advanced imaging technology"—

(i) means a device used in the screening of passengers that creates a visual image of an individual showing the surface of the skin and revealing other objects on the body; and

(ii) may include devices using backscatter x-rays or millimeter waves and devices referred to as "whole-body imaging technology" or "body scanning machines".

(B)Appropriate congressional committees.—The term "appropriate congressional committees" means—

(i) the Committee on Commerce, Science, and Transportation and the Committee on Homeland Security and Governmental Affairs of the Senate; and

(ii) the Committee on Homeland Security of the House of Representatives.

(C) Automatic target recognition software.—

The term "automatic target recognition software" means software installed on an advanced imaging technology that produces a generic image of the

individual being screened that is the same as the images produced for all other screened individuals.

(2) Use of advanced imaging technology.—Beginning June 1, 2012, the Assistant Secretary of Homeland Security (Transportation Security Administration) shall ensure that any advanced imaging technology used for the screening of passengers under this section—

(A) is equipped with and employs automatic target recognition software; and

(B) complies with such other requirements as the Assistant Secretary determines necessary to address privacy considerations.

(3) Extension.—

(A)In general.—The Assistant Secretary may extend the deadline specified in paragraph (2), if the Assistant Secretary determines that—

(i) an advanced imaging technology equipped with automatic target recognition software is not substantially as effective at screening passengers as an advanced imaging technology without such software; or

(ii) additional testing of such software is necessary.

(B) Duration of extensions.—

The Assistant Secretary may issue one or more extensions under subparagraph (A). The duration of each extension may not exceed one year.

(4) Reports.—

(A) In general.—

Not later than 60 days after the deadline specified in paragraph (2), and not later than 60 days after the date on which the Assistant Secretary issues any extension under paragraph (3), the Assistant Secretary shall submit to the appropriate congressional committees a report on the implementation of this subsection.

(B) Elements.—A report submitted under subparagraph (A) shall include the following:

(i) A description of all matters the Assistant Secretary considers relevant to the implementation of the requirements of this subsection.

(ii) The status of compliance by the Transportation Security Administration with such requirements.

(iii) If the Administration is not in full compliance with such requirements—

(I) the reasons for the noncompliance; and

(II) a timeline depicting when the Assistant Secretary expects the Administration to achieve full compliance.

(C) Security classification.—

To the greatest extent practicable, a report prepared under subparagraph (A) shall be submitted in an unclassified format. If necessary, the report may include a classified annex.

49 U.S. Code § 44902 - Refusal to transport passengers and property

(a) Mandatory Refusal.—The Under Secretary of Transportation for Security shall prescribe regulations requiring an air carrier, intrastate air carrier, or foreign air carrier to refuse to transport—

(1) a passenger who does not consent to a search under section 44901(a) of this title establishing whether the passenger is carrying unlawfully a dangerous weapon, explosive, or other destructive substance; or

(2) property of a passenger who does not consent to a search of the property establishing whether the property unlawfully contains a dangerous weapon, explosive, or other destructive substance.

[Subsections (b)-(c) omitted]

49 U.S. Code § 44903 - Air transportation security

(a) Definition.—In this section, "law enforcement personnel" means individuals—

(1) authorized to carry and use firearms;

(2) vested with the degree of the police power of arrest the Under Secretary of Transportation for Security considers necessary to carry out this section; and
(3) identifiable by appropriate indicia of authority.

(b)Protection Against Violence and Piracy.—The Under Secretary shall prescribe regulations to protect passengers and property on an aircraft operating in air transportation or intrastate air transportation against an act of criminal violence or aircraft piracy. When prescribing a regulation under this subsection, the Under Secretary shall—
(1) consult with the Secretary of Transportation, the Attorney General, the heads of other departments, agencies, and instrumentalities of the United States Government, and State and local authorities;
(2) consider whether a proposed regulation is consistent with—
(A) protecting passengers; and
(B) the public interest in promoting air transportation and intrastate air transportation;
(3) to the maximum extent practicable, require a uniform procedure for searching and detaining passengers and property to ensure—
(A) their safety; and
(B) courteous and efficient treatment by an air carrier, an agent or employee of an air carrier, and Government, State, and local law enforcement personnel carrying out this section; and
(4) consider the extent to which a proposed regulation will carry out this section.

[Subsections (c)-(n) omitted]

49 U.S. Code § 46110 - Judicial review

(a) Filing and Venue.—

Except for an order related to a foreign air carrier subject to disapproval by the President under section 41307 or 41509(f) of this title, a person disclosing a substantial interest in an order issued by the Secretary of Transportation (or the Under Secretary of Transportation for Security with respect to security duties and powers designated to be carried out by the Under Secretary or the Administrator of the Federal Aviation Administration with respect to aviation duties and powers designated to be carried out by the Administrator) in whole or in part under this

part, part B, or subsection (*l*) or (s) of section 114 may apply for review of the order by filing a petition for review in the United States Court of Appeals for the District of Columbia Circuit or in the court of appeals of the United States for the circuit in which the person resides or has its principal place of business. The petition must be filed not later than 60 days after the order is issued. The court may allow the petition to be filed after the 60th day only if there are reasonable grounds for not filing by the 60th day.

(b) Judicial Procedures.—

When a petition is filed under subsection (a) of this section, the clerk of the court immediately shall send a copy of the petition to the Secretary, Under Secretary, or Administrator, as appropriate. The Secretary, Under Secretary, or Administrator shall file with the court a record of any proceeding in which the order was issued, as provided in section 2112 of title 28.

(c) Authority of Court.—

When the petition is sent to the Secretary, Under Secretary, or Administrator, the court has exclusive jurisdiction to affirm, amend, modify, or set aside any part of the order and may order the Secretary, Under Secretary, or Administrator to conduct further proceedings. After reasonable notice to the Secretary, Under Secretary, or Administrator, the court may grant interim relief by staying the order or taking other appropriate action when good cause for its action exists. Findings of fact by the Secretary, Under Secretary, or Administrator, if supported by substantial evidence, are conclusive.

(d) Requirement for Prior Objection.—

In reviewing an order under this section, the court may consider an objection to an order of the Secretary, Under Secretary, or Administrator only if the objection was made in the proceeding conducted by the Secretary, Under Secretary, or Administrator or if there was a reasonable ground for not making the objection in the proceeding.

(e) Supreme Court Review.—

A decision by a court under this section may be reviewed only by the Supreme Court under section 1254 of title 28.

49 CFR § 1540.107 Submission to screening and inspection.

(a) No individual may enter a sterile area or board an aircraft without submitting to the screening and inspection of his or her person and accessible property in accordance with the procedures being applied to control access to that area or aircraft under this subchapter.

(b) An individual must provide his or her full name, as defined in § 1560.3 of this chapter, date of birth, and gender when -

(1) The individual, or a person on the individual's behalf, makes a reservation for a covered flight, as defined in § 1560.3 of this chapter, or

(2) The individual makes a request for authorization to enter a sterile area.

(c) An individual may not enter a sterile area or board an aircraft if the individual does not present a verifying identity document as defined in § 1560.3 of this chapter, when requested for purposes of watch list matching under § 1560.105(c), unless otherwise authorized by TSA on a case-by-case basis.

(d) The screening and inspection described in paragraph (a) of this section may include the use of advanced imaging technology. Advanced imaging technology used for the screening of passengers under this section must be equipped with and employ automatic target recognition software and any other requirement TSA deems necessary to address privacy considerations.

(1) For purposes of this section, advanced imaging technology–
(i) Means a device used in the screening of passengers that creates a visual image of an individual showing the surface of the skin and revealing other objects on the body; and (ii) May include devices using backscatter x-rays or millimeter waves and devices referred to as whole body imaging technology or body scanning machines.

(2) For purposes of this section, automatic target recognition software means software installed on an advanced imaging technology device that produces a generic image of the individual being screened that is the same as the images produced for all other screened individuals.

ADDENDUM ON STANDING

Declaration of Iain Murray

Declaration of Marc Scribner

No. 16-1135

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

COMPETITIVE ENTERPRISE INSTITUTE, THE RUTHERFORD INSTITUTE, IAIN MURRAY, and MARC SCRIBNER, Petitioners,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, *et al.*

DECLARATION OF IAIN MURRAY

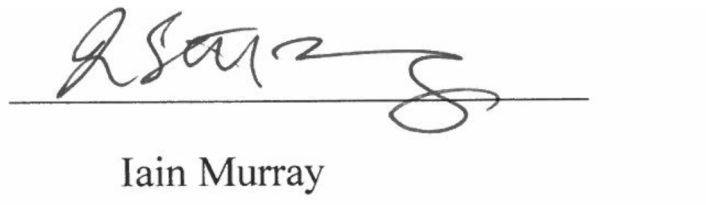
1. I, Iain Murray, a petitioner in this action, am the Vice President of Strategy of the Competitive Enterprise Institute. I reside in Virginia.

2. I regularly travel as a passenger on commercial airplanes. As such, I am subjected to passenger screening using advanced imaging technology. For example, despite joining TSA PreCheck, I was randomly selected at Dulles Airport to go through additional screening, which meant I had to go through an Advanced Imaging Technology (AIT) body scanner. More recently, at Indianapolis airport, I was also selected for random AIT screening and swabbing. I had a broken leg at the time, and while hopping through the walk-through metal detector did not cause problems for me, I had to stand in the scanner on both legs with my arms up and without my cane. This cause me additional pain.

3. I object to the use of such body screeners because they intrude upon my privacy even though they no longer supposedly produce a realistic image of my naked body. I am also concerned that the raw scanner data may somehow be put to improper purposes. I am a British citizen and I have researched the effectiveness of

CCTV street camera footage in the United Kingdom; I discovered that, despite official assurances to the contrary, CCTV images were occasionally used and trade for improper purposes. Finally, I am concerned that the long-term safety of AIT scanners has not been adequately demonstrated. For these reasons, I may well substitute car travel for flying in the future.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 21, 2016 in Washington, D.C.



Iain Murray

No. 16-1135

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

COMPETITIVE ENTERPRISE INSTITUTE, THE RUTHERFORD INSTITUTE, IAIN MURRAY, and MARC SCRIBNER, Petitioners,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, *et al.*

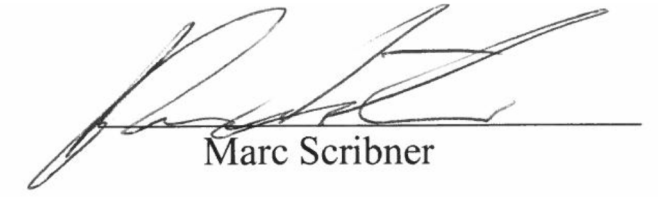
DECLARATION OF MARC SCRIBNER

1. I, Marc Scribner, a petitioner in this action, am a Fellow in Land-use and Transportation Studies at the Competitive Enterprise Institute. I reside in the District of Columbia.

2. I regularly travel as a passenger on commercial airplanes. As such, I am subjected to passenger screening using advanced imaging technology.

3. I object to the body screeners used by TSA, and authorized by its March 2016 rule, because they intrude upon my privacy and comfort, and add to the delays and inconveniences that I must go through before I board a plane. I would not object as much if these problems were warranted by the improved effectiveness of body scanners, but from my own experiences and from what I have read, that is not the case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 23, 2016 in Washington, D.C.



Marc Scribner

ADDENDUM OF OPPOSING COMMENTS

Comments Primarily Opposed to TSA's Proposed Rule (TSA-2013-0004-xxxx)

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