



Consumer Federation of America

1620 I Street, N.W., Suite 200 * Washington, DC 20006

**Comments of Consumer Federation of America to the
Transportation Security Administration
Passenger Screening Using Advanced Imaging Technology
TSA-2013 -0004-0034
June 21, 2013**

Consumer Federation of America (CFA) is a nonprofit association of nearly 300 nonprofit consumer organizations across the United States. Established in 1968, CFA's mission is to advance consumers' interests through research, education and advocacy.

Privacy is a fundamental consumer issue. CFA believes that individuals have the right to travel free of unwarranted intrusions on their privacy by commercial or governmental entities. Obviously, effective and sensible precautions are necessary to protect the flying public. At issue is whether nude body scanning is the best way to provide that protection and how to balance security interests with individuals' privacy rights. CFA would like to offer the following brief comments to the Transportation Security Administration (TSA) in regard to the Notice of Proposed Rulemaking cited above.

The use of terms such as advanced imaging technology is misleading.

Technology that scans an individual's nude body should be called what it is – nude body scanning. The TSA's use of more vague terms such as "advanced imaging technology" or "whole body imaging" does not accurately convey what is being done and has the capacity to mislead consumers into thinking that the images are less revealing than they are.

Other security options should be given full consideration.

The TSA appears to have discounted security options such as walk-through metal detectors devices and explosive trace detection devices as alternatives to nude body scanning. We believe that these options can be just as effective as nude body scanning without unduly intruding on individuals' privacy and the TSA has failed to justify why they should not be used instead.

Individuals should be able to opt-out of nude body scanning without undergoing equally intrusive pat-downs.

Anyone who has gone through the pat-downs that are currently used if individuals decline to go through nude body scanning or are unable to do so because of medical devices or conditions knows how deeply intrusive and uncomfortable they are. Generic image filters offer at least a modicum of privacy, yet there is nothing in the proposed rules that would require their use or that would offer individuals any less intrusive alternatives for screening.

The U.S. government can and must do more to protect the security *and* privacy of the flying public.

Respectfully submitted:

A handwritten signature in black ink that reads "Susan Grant". The signature is written in a cursive, flowing style.

Susan Grant
Director of Consumer Protection
Consumer Federation of America