

# **The Identity Project**

**www.PapersPlease.org**

1736 Franklin Street, 9th Floor  
Oakland, CA 94612  
510-208-7744 (office)  
415-824-0214 (cell/mobile)

September 24, 2012

Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)  
Executive Office of the President

fax: 202-395-7245

Dear OIRA:

We are writing to provide submit comments on, and to request a meeting with you concerning, your review of proposed Department of State information collection requests Form DS-5513 (ICR Reference Number 201208-1405-002) and Form DS-5520 (ICR Reference Number 201208-1405-002).

According to your website at <<http://www.reginfo.gov/public/jsp/Utilities/faq.jsp>>:

OIRA's policy is to meet with any party interested in discussing issues on a rule under review.... Groups and individuals interested in meeting with OIRA regarding a rule under review should call 202-395-6880. Please provide the name of the regulatory action you or your group would like to discuss.

In addition to submitting comments through regulations.gov, outside parties may provide written comments to the OIRA Administrator on a regulatory action under review. Parties may also request a meeting with the Administrator.

The best way to communicate comments to OIRA is by fax at (202-395-7245). The best way to request a meeting regarding a rule is to contact the Docket Library at 202-395-6880.

At any point, members of the public may also submit comments to ... OIRA about any currently approved information collections.

In accordance with this OIRA policy, we have left a telephone message at 202-395-6880 requesting a meeting with OIRA concerning the proposed Department of State (DOS) information collections Form DS-5513 and Form DS-5520. We are also submitting to OIRA the attached comments concerning these forms, which were filed with the DOS but which do not appear to have been considered by the DOS.

Also attached for consideration by OIRA in its review of these proposed information collections is our complaint that the proposed information collection and the proposed use of this information violates U.S. obligations pursuant to international human rights treaties. This complaint was submitted to the Secretary of State, in accordance with Executive Order 13107, on April 24, 2011. More than a year later, we have received no acknowledgement or response to this complaint, and nothing to indicate that any of the issues we have raised have been considered by the DOS. We have also received no response to our FOIA request for any DOS records pertaining to this complaint, which was filed with the DOS on July 11, 2011.

Please contact me in San Francisco at 415-824-0214 to arrange a mutually agreeable time for a meeting to discuss these proposed information collection requests.

Sincerely,

/s/

Edward Hasbrouck  
Consultant on travel-related civil liberties and human rights issues  
The Identity Project