VIA E-MAIL

September 21, 2015

Mr. Edward Hasbrouck
The Identity Project
1736 Franklin Street
9th Floor
Oakland, CA 94612

Re: Freedom of Information Act Request – Interim Response #4
Tracking Number: 15-FOI-00021

Dear Mr. Hasbrouck:

We are further responding to your October 29, 2014 request for information made under the Freedom of Information Act (FOIA), which was received via e-mail by Amtrak’s FOIA Office on the same date.

Your request seeks the records described below:

(1) Any records of policies, procedures, technical specifications, contracts (including agency appointment agreements), or directives to staff, contractors, or agents pertaining to transfers of data about Amtrak passengers or customers to the Department of Homeland Security (DHS), any DHS component including US Customs and Border Protection (USCBP), the Canadian Border Services Agency (CBSA), any other Canadian government agency, or any other foreign government, or the subsequent handling or use of such data, including without limitation Advanced Passenger Information (API) and any personally identifiable data obtained or derived from the ARROW reservation system.

(2) Any records pertaining to the legal basis for such data transfers, including any e-mail messages pertaining to this subject within or between Amtrak, Amtrak agents, Amtrak contractors, and any third party or parties.

(3) Any records of policies, procedures, technical specifications, contracts (including agency appointment agreements), or directives to staff, contractors, or agents (including without limitation travel agencies and agents authorized to sell Amtrak tickets, and other ARROW users) regarding disclosures to be made concerning transfers of data about Amtrak passengers or customers to government agencies including DHS.

(4) Any records of policies, procedures, reports, or directives to staff, contractors, or agents (including without limitation travel agencies and agents authorized to sell Amtrak tickets, and other ARROW users) regarding compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA) of Canada, including handling of requests for records or other requests or complaints made pursuant to PIPEDA and any disclosures to be made to passengers or customers.
(5) Any e-mail messages within or between Amtrak and Amtrak agents, Amtrak contractors, and any third party or parties containing any of the text strings "Personal Information Protection and Electronic Documents Act", "PIPEDA", or "Privacy Commissioner of Canada".

(6) Any electronic file in which any of the above records are included.

(7) All metadata pertaining to any such file, such as file system information indicating the creation data, modification date, etc.

We are continuing to review and process records. Please find attached records determined to be responsive to your request (22 pages).

The names and personal identifying information of Amtrak and Department of Homeland Security (DHS) have been redacted from the enclosed records pursuant to exemption 6 of the FOIA on the basis that disclosure would constitute a clearly unwarranted invasion of the personal privacy of these individuals. In weighing the public interest, it was determined that there was no public interest in disclosing this information.

Pursuant to Amtrak's FOIA regulations (49 CFR 701.10), if you wish to appeal the decision to withhold the above-mentioned information, you may file an appeal with Eleanor D. Acheson, Executive Vice President, Chief Legal Officer, General Counsel and Corporate Secretary, within thirty days (30) of the date of this letter, specifying the relevant facts and the basis for your appeal. Your appeal may be sent to Ms. Acheson at the above address. The President and CEO of Amtrak have delegated authority to the General Counsel and Corporate Secretary for the rules and compliance to the FOIA. If you decide to appeal, you may delay your appeal until you have received the final response to your request.

The FOIA Office is working through its backlog of requests. You may anticipate your next response in approximately 4 weeks.

If you have any questions regarding the processing of your request, please feel free to contact me at (202) 906-3741 or via e-mail at Hawkins@amtrak.com.

Sincerely,

Sharron Hawkins
Lead FOIA Specialist

Attachments
From: [redacted]@CBP.DHS.GOV
Sent: Monday, August 20, 2012 9:38 AM
To: [redacted]
Subject: RE: Amtrak - USCBP eTicketing Reports

Thank you.

APD Passenger
U.S. Customs and Border Protection
Office of Field Operations
237 West Service Road
Champlain, NY 12919

[dhs.gov]
(desk)
(fax)
(blackberry)

From: [redacted]
Sent: Thursday, August 16, 2012 1:18 PM
To: [redacted]
Subject: FW: Amtrak - USCBP eTicketing Reports

Hi,

The below is what I sent to [redacted] last week.

Thanks!

Amtrak
Project Manager - Sales and Reservation Systems
60 Massachusetts Ave. NE 4W-111
Washington, DC. 20002
Phone: [redacted] [Mobile: [redacted]]

From: [redacted]
Sent: Friday, August 10, 2012 1:41 PM
To: [redacted]@dhs.gov
Cc: [redacted]
Subject: Amtrak - USCBP eTicketing Reports

Good afternoon [redacted]

Thank you very much for the thorough tour of the port and the detail explanation of the processes you go through to check our passengers. We appreciate yourself and [redacted] taking the time to do this.
As promised, this link https://citrix.amtrak.com/Citrix/AccessPlatform/auth/login.aspx will be what you team use to access the Amtrak reports. We will put procedures together on what to do when the site is accessed and where to find the reports.

To grant access to our system we need the following information from the members of your team who will access the reports. We will provide RSA SecureID’s to each of the team members as well as ID’s to access the system.

- Full Name
- Full Date of Birth
- Social Security Number

As requested, [Name] is currently emailing the reports at 10:30a to your team so you have enough time to analyze the onboard report prior to departing to the stations.

Please feel free to contact me if you have any questions. I look forward to hearing back from you with the information above.

Thanks again!

[Name]

Amtrak

Project Manager – Sales and Reservation Systems

60 Massachusetts Ave. NE 4W-111

Washington, DC 20002

Phone: [Phone Number] (Bell) [Phone Number] (Mobile)
Exemption 6

From: [Email Address]
Sent: Friday, August 17, 2012 11:41 AM
To: [Email Address]
Cc: [Email Address]
Subject: RE: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest

Certainly. Copying my colleagues [Redacted] and [Redacted] who are also involved in sending this manifest.

From: [Email Address]
Sent: Friday, August 17, 2012 11:23 AM
To: [Email Address]
Subject: FW: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest

Mr. [Redacted],

Could you add [Redacted]@dhs.gov to the distribution list for the Amtrak 68 manifest? Also, if possible, can we get the outbound manifest sent solely to this address??

Thanks,

[Redacted]
Chief CBP Officer -- Tactical Operations
U.S. Customs and Border Protection
Office of Field Operations
Champlain, NY

[Redacted] (Office)
[Redacted] (Blackberry)
[Redacted] (Email)

This document and any attachments(s) may contain restricted, sensitive, and/or law enforcement-sensitive information belonging to the U.S. Government. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. If you received this communication in error, please immediately notify the sender and delete or destroy this communication and all attachments.

From: [Email Address]
Sent: Thursday, August 16, 2012 8:24 AM
To: [Email Address]
Subject: FW: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest

[Redacted]
U.S. Customs and Border Protection
Office of Field Operations
237 West Service Road
Champlain, NY 12919

[Redacted] (phone)
[Redacted] (fax)
Subject: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest
From: [redacted]@cbp.dhs.gov
Sent: Friday, August 17, 2012 11:23 AM
To: [redacted]
Subject: FW: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest

Could you add [redacted]@dhs.gov to the distribution list for the Amtrak 68 manifests? Also, if possible, can we get the outbound manifest sent solely to this address??

Thanks,

[Chief CBP Officer - Tactical Operations
U.S. Customs and Border Protection
Office of Field Operations
Champlain, NY]

(Office)
(Blackberry)
@dhs.gov

This document and any attachments(s) may contain restricted, sensitive, and/or law enforcement-sensitive information belonging to the U.S. Government. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. If you received this communication in error, please immediately notify the sender and delete or destroy this communication and all attachments.

From: [redacted]@cbp.dhs.gov
Sent: Thursday, August 16, 2012 8:24 AM
To: [redacted]
Subject: FW: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest

U.S. Customs and Border Protection
Office of Field Operations
237 West Service Road
Champlain, NY 12919
[phone]
[fax]

From: [redacted] (mailto:[redacted])
Sent: Wednesday, August 15, 2012 10:17 AM
To: [redacted]
Subject: Amtrak train 68 - August 15th 2012, Onboard Passenger Manifest
Thanks. We need to do it on the weekends too so the auto-run will be good

I will, but it should be pretty straight forward. [Redacted] has previously talked about setting up a automatic run and email. I'll get with him this afternoon and try to set it up. Until then I will do it manually.

Let me know if you have any questions about what we need to do for this.

Thanks
I've also added additional contacts from the eTicketing team that will assist in providing the necessary information to CBP, namely:

- Senior Director Sales Distribution & Customer Service
- Senior Analyst Financial and Operating Reporting

Attached is a sample actual passenger manifest from train 66 this morning, and I will coordinate sending a similar file on a daily basis to those on this email list. We will aim to send this manifest file at 10:30am each morning unless the train is late to the degree that we think the list is incomplete, in which case the 10:45am email will provide an estimated time for delivery of the completed list.

Regards,

Office:
Cell:

From: [redacted]
Sent: Tuesday, July 31, 2012 4:35 PM
To: [redacted]
Cc: [redacted]
Subject: RE: Amtrak Clearance

As promised, I am replying to all and adding the following Amtrak contacts.

- Program Director for the e-Ticketing project
- Superintendent of Operations for the Empire District which includes operations to Montreal
- Assistant Superintendent of Operations
- District Manager of Stations

Perhaps we should have occasional conference calls to keep all of us better advised of current problems and new initiatives.

Thanks,

Amtrak - Operations - Washington
"Amtrak's Single Point of Contact for Cross Border Operations" - Not my title but it is what I've been designated.
Office: [redacted]
Mobile: [redacted]

From: [redacted]
Sent: Tuesday, July 31, 2012 3:00 PM
To: [redacted]
Cc: [redacted]
Subject: Amtrak Clearance
It was very nice speaking with you. Your willingness to assist us with our needs is very refreshing. I have
attached all those who may have a hand in supervising the inspection of your train. If you create an email group
and send the list of onboard passengers after the last Canadian stop it would assist our efforts. Additionally the
e-ticketing i-phone we spoke of would be the ultimate solution and look forward to getting one or two of those
and some training for our supervisors. Thanks again.

APD Passenger
U.S. Customs and Border Protection
Office of Field Operations
237 West Service Road
Champlain, NY 12919

@dhsgov
(desk)
(fax)
(blackberry)
From: [Redacted]
Sent: Tuesday, July 31, 2012 6:37 PM
To: [Redacted]
Cc: [Redacted]

Subject: RE: Amtrak Clearance

I've also added additional contacts from the eTicketing team that will assist in providing the necessary information to CBP, namely:

[Redacted] - Senior Director Sales Distribution & Customer Service
[Redacted] - Senior Analyst Financial and Operating Reporting

Attached is a sample actual passenger manifest from train 68 this morning, [Redacted] and I will coordinate sending a similar file on a daily basis to those on this email list. We will aim to send this manifest file at 10:30am each morning unless the train is late to the degree that we think the list is incomplete, in which case the 10:45am email will provide an estimated time for delivery of the completed list.

Regards,

[Redacted]

From: [Redacted]
Sent: Tuesday, July 31, 2012 4:35 PM
To: [Redacted]
Cc: [Redacted]

Subject: RE: Amtrak Clearance
As promised, I am replying to all and adding the following Amtrak contacts.

- Program Director for the e-Ticketing project
- Superintendent of Operations for the Empire District which includes operations to Montreal
- Assistant Superintendent of Operations
- District Manager of Stations

Perhaps we should have occasional conference calls to keep all of us better advised of current problems and new initiatives.

Thanks,

Amtrak — Operations — Washington
"Amtrak’s Single Point of Contact for Cross Border Operations" — Not my title but it is what I've been designated.
Office — [redacted]
Mobile — [redacted]

From: [redacted]@CBP.DHS.GOV
Sent: Tuesday, July 31, 2012 3:00 PM
To: [redacted]@CBP.DHS.GOV

Subject: Amtrak Clearance

It was very nice speaking with you. Your willingness to assist us with our needs is very refreshing. I have attached all those who may have a hand in supervising the inspection of your train. If you create an email group and send the list of onboard passengers after the last Canadian stop it would assist our efforts. Additionally the e-ticketing i-phone we spoke of would be the ultimate solution and look forward to getting one or two of those and some training for our supervisors. Thanks again.

APD Passenger
U.S. Customs and Border Protection
Office of Field Operations
237 West Service Road
Champlain, NY 12919
[redacted]@dhs.gov
(Desk)
(fax)
(blackberry)
Exemption 6

From: tsa.dhs.gov
Sent: Tuesday, July 31, 2012 2:13 PM
To: RE: U.S. Customs RSP
Cc:
Subject: RE: U.S. Customs RSP

This is to confirm the information I provided by phone. The US Customs and Border Protection Individual that you may want to contact is , Chief of Staff, Office of Field Operations. His phone number is: 

Please let me know if we can provide any additional information.

From:
Sent: Tuesday, July 31, 2012 1:05 PM
To:
Cc:
Subject: FW: U.S. Customs RSP
Importance: High

I've left you a vm requesting a call back (I don't have a phone number for ). Our train traveling south from Montreal today had some difficulties with US Customs Inspectors today, where apparently they normally match the paper tickets collected from passengers against the 'planned passenger manifest'. There is a concern that tomorrow's train may not be allowed to enter the country if this cannot be resolved.

Could you please provide me with a point of contact in Customs to help resolve this issue? We can email a real-time passenger manifest to help support any existing processes if necessary. But the report of who is really on the train that in the past they got from the conductors in the form of a stack of paper tickets is being replaced with an electronic manifest on the conductor device.

I would appreciate your quick response to this request.

Regards,

Amtrak eTicketing Program Director
Office:
Cell:

From: 
Sent: Tuesday, July 31, 2012 12:29 PM
To:
Cc:
Subject: FW: U.S. Customs RSP

or can you please advise what communication has been had with Customs on eTicketing? There appears to be a problem today, and I'm assuming its a mls-communication internally to them since we didn't hear of this yesterday, but we'll need to know who you've been dealing with to correct the problem.
Thanks,

Exemption 6

District Superintendent Operations,
Amtrak, Empire District

From: [Redacted]
Sent: Tuesday, July 31, 2012 12:22 PM
To: [Redacted]
Subject: U.S. Customs RSP

68 is having trouble at RSP customs because customs no longer has physical tickets to match to their manifest. They want to know why no one notified them that Amtrak was going to eticketing? Someone from customs is supposed to call me in a few minutes to find out. They're checking the conductor's eMD device against the manifest right now.

If they've been used to taking the conductor's stack of tickets and matching them to their manifest, not much I can offer them going forward other than checking ID's against their manifest.

AMTRAK'S EMPIRE DISTRICT

[Redacted]
District Manager, Stations, ALB
625 East St.
Rensselaer, NY 12144
ATS: [Redacted]
Com: [Redacted]
Fax: [Redacted]

The information contained in this e-mail is intended only for the personal and confidential use of the recipients named above. Information contained in this email may be privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this email and any attachments in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by email and delete the original message.
Hello,

U.S. Customs and Border Protection (CBP) will soon be sending an official letter to inform Amtrak of documents that may be presented by members of the Old Order Amish and Old Order Mennonite communities entering the United States upon implementation of the Western Hemisphere Travel Initiative (WHTI) at land and sea ports of entry on June 1, 2009.

U.S. citizen members of the Old Order Amish or Old Order Mennonite communities may be presenting a valid and signed Internal Revenue Service (IRS) Form 4029, Application for Exemption From Social Security and Medicare Taxes and Waiver of Benefits, as evidence of identity, along with a birth certificate indicating birth within the United States as evidence of citizenship. Alternative documents that may be presented as evidence of citizenship include a U.S. Certificate of Citizenship, a U.S. Certificate of Naturalization, or a U.S. Consular Report of Birth Abroad. At this time, there is no official policy with regard to Canadian members of the Old Order Amish or Old Order Mennonite communities, although we continue to work with them on this matter and will be flexible with WHTI implementation on June 1.

We appreciate your support in accepting these documents, until further notice from CBP, for such travelers entering the United States upon implementation of WHTI on June 1, 2009. A blank IRS Form 4029 can be found at: http://www.irs.gov/pub/irs-pdf/f4029.pdf

Please contact me if you have any questions or concerns.

Thanks,

Program Manager
Western Hemisphere Travel Initiative
U.S. Customs and Border Protection
Good morning [Redacted] and [Redacted]

Attached is the final High Level Scope and Sizing.

I will begin working on the schedule and timeline.

[Redacted] will meet with [Redacted] regarding funding.

Regards,

[Redacted]
PMP
Antrak System Developer
Border Crossing ID types

ITPIR # 2487

AMTRAK

High Level Sizing

DOCUMENT

Exemption 6

Prepared By: 
Date: August 28, 2008
Version: 1.4
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CS\Users\shawk\AppData\Local\Microsoft\Windows\Temporary Internet Files\Content.Outlook\WK6Q46Z8\BCCID_SCS (2).doc  Page 2 of 8
1. Requirements Overview

The US Department of Homeland security has updated the required ID types for land crossing of the United States and Canadian border. Passengers are required to have one of these ID types when using Amtrak as a travel option across the U.S. / Canadian Border. Additionally, after June 1, 2009, two ID types that are currently valid will no longer be accepted.

Enhancements will be made to add the following ID types:
- US Passport Card
- Trusted Traveler Cards (NEXUS, SENTRI, or FAST).
- State or Provincial Issued Enhanced Driver’s License.
- Enhanced Tribal Cards
- US Merchant Mariner Document
- Form I-872 American Indian Card

The following ID types will no longer be accepted after June 1, 2009:
- US or CA Birth Certificate
- US Naturalization Certificate

Any changes to the requirements may necessitate further analysis and possible updating of this document, in particular of the high level sizing estimates.

2. Project Deliverables

The SPID processing will be enhanced to accept the following ID types:
- US Passport Card
- Trusted Traveler Cards (NEXUS, SENTRI, or FAST).
- State or Provincial Issued Enhanced Driver’s License.
- Enhanced Tribal Cards
- US Merchant Mariner Document
- Form I-872 American Indian Card

The following IDs will not be accepted as a valid ID after June 1, 2009:
- US or CA Birth Certificate
- US Naturalization Certificate

The following ID types will continue to be valid for passengers under age 16:
- US or CA Birth Certificate
- US Naturalization Certificate

The following ID types will continue to be valid for passengers’ age 16 to 18 traveling in a group:
2.1 Arrow
- Validate the new options and option requirements for the Passenger Identification Entry (SPID).
- Develop new date restrictions for Birth Certificate (BC) and Naturalization Certificate (NC).
- Develop new age restrictions for Birth Certificate (BC) and Naturalization Certificate (NC).
- Direct development testing with Department of Homeland Security (DHS) Advanced Passenger Information System (APIS)
- Testing and Support

2.2 Arrow - GDS
- Testing and Support

2.3 EAI / XAAPI
- Update the DTD and Error lookup table.
- Testing and Support

There are no coding changes in the XAAPI Arrow input/output based on the provided information.
There are no anticipated changes to Web Services request and response.

2.4 RailRes
- Define new types for display in the document type pop-up (passport card, etc.)
-Send the new translated type codes (TBD) as part of the SPID entry.
- Remove those types that can no longer be used.
- Testing and Support

2.5 STARS
- Define new types for display in the document type pop-up (passport card, etc.)
- Send the new translated type codes (TBD) as part of the SPID entry.
- Remove those types that can no longer be used.
- Testing and Support

2.6 Internet Booking
- All existing rules and logic in IB for border crossing will remain the same.
- Arrow will enforce all new rules outlined in the requirement document for TPPIR #2487.
- Testing and Support

3. Project Design Considerations
   1. Arrow will handle the enforcement of the restricted use scenarios
2. No new entries will be required for this project (taken from the requirements document).
3. The country code position of the SPID entry will also be used to pass state codes for ID types that use a state code rather than a country code.
4. The PNR SPID display formats will remain the same.
5. Infant formats remain the same.

4. High Level Dependencies
   No known development dependencies.
### 5. Areas impacted

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<td>BIS</td>
<td>N</td>
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<tr>
<td>State Agencies</td>
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<td>Carlson (Loyalty)</td>
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<tr>
<td>Station Operations</td>
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<td>Data Warehouse</td>
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<td>Tariff</td>
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<tr>
<td>Train Operations (CNOCC)</td>
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<td></td>
<td>GDS</td>
<td>Y</td>
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<tr>
<td>VRU</td>
<td>N</td>
<td></td>
<td>Quik-Trak</td>
<td>N</td>
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</tr>
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<td></td>
<td></td>
<td></td>
<td>Internet</td>
<td>Y</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>VRU</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Handheld</td>
<td>N</td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>CTI</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>EAI</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>RailRes</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>RailResSTARS</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<td>Western Folder</td>
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6. High Level Estimates

6.1 Total Project Estimates

### 6.1.1 Total AT Estimates

<table>
<thead>
<tr>
<th>Estimate</th>
<th>Check One</th>
<th>List AT Areas Impacted*</th>
<th>Estimated Hours</th>
<th>Estimated Cost</th>
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<tr>
<td>Less than 100 Hours</td>
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<td>$0 - $8,000</td>
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<tr>
<td>Between 100 - 500 Hours</td>
<td></td>
<td>Arrow</td>
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</tr>
<tr>
<td>$8,000 - $40,000</td>
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<td>EAI/XAAPI, RailRes</td>
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<tr>
<td>Between 500 - 1000 Hours</td>
<td>X</td>
<td>Arrow</td>
<td>630</td>
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<tr>
<td>$40,000 - $80,000</td>
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<td>STARS, GDS, IB</td>
<td></td>
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</tr>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Between 1000 - 2000 Hours</td>
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<td>Arrow</td>
<td></td>
<td></td>
</tr>
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<td>$80,000 - $160,000</td>
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<td>EAI/XAAPI, RailRes</td>
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<td>STARS, GDS, IB</td>
<td></td>
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</tr>
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<td></td>
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<td></td>
</tr>
<tr>
<td>Between 2000 - 4000 Hours</td>
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<td>Arrow</td>
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<tr>
<td>$160,000 - $320,000</td>
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<td>EAI/XAAPI, RailRes</td>
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<td></td>
<td>STARS, GDS, IB</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Over 4000</td>
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<td></td>
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</tr>
<tr>
<td>Over $320,000</td>
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<td>EAI/XAAPI, RailRes</td>
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</tr>
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<td>STARS, GDS, IB</td>
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<td></td>
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</tbody>
</table>

**PROJECT TOTAL COSTS including Hardware**

* BIS, DIS, Arrow, RailRes, RailResSTARS, EAI, etc.
6.1.2 Project Estimate Breakout

The following distribution channels have been included in this estimate:

<table>
<thead>
<tr>
<th>Distribution Channel</th>
<th>Impacted?</th>
<th>Hours Estimate</th>
<th>Cost Estimate</th>
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<tbody>
<tr>
<td>Arrow</td>
<td>Y</td>
<td>300</td>
<td>$22,500.00</td>
</tr>
<tr>
<td>EAI/XAAPI</td>
<td>Y</td>
<td>60</td>
<td>$4,500.00</td>
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<tr>
<td>RailRes</td>
<td>Y</td>
<td>40</td>
<td>$3,000.00</td>
</tr>
<tr>
<td>RailRes/Stars</td>
<td>Y</td>
<td>40</td>
<td>$3,000.00</td>
</tr>
<tr>
<td>VRU</td>
<td>N</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quik-Trak</td>
<td>N</td>
<td></td>
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<tr>
<td>ASAP</td>
<td>N</td>
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<tr>
<td>Internet</td>
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<td>150</td>
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<td>DIS</td>
<td>N</td>
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<tr>
<td>Data Warehouse</td>
<td>N</td>
<td></td>
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</tr>
<tr>
<td>BIS</td>
<td>N</td>
<td></td>
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</tr>
<tr>
<td>Mail &amp; Express</td>
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<td></td>
<td></td>
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<tr>
<td>GDS</td>
<td>Y</td>
<td>40</td>
<td>$3,000.00</td>
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<tr>
<td>Other</td>
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<td></td>
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<tr>
<td><strong>Sub-Total All Areas</strong></td>
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<td>560</td>
<td><strong>$47,250.00</strong></td>
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<tr>
<td>Project Management (10%)</td>
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<td><strong>$4,200.00</strong></td>
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<tr>
<td>Quality Assurance (10%)</td>
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<td><strong>$4,200.00</strong></td>
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<tr>
<td><strong>Project Total</strong></td>
<td></td>
<td></td>
<td><strong>$55,650.00</strong></td>
</tr>
</tbody>
</table>

6.2 Hardware Costs

There are no hardware costs.