

The Identity Project

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September 1, 2020

Transportation Security Administration
FOIA Branch
TSA-20, East Tower
601 South 12th Street
Arlington, VA 20598-6020

via e-mail to <foia@tsa.dhs.gov>

FOIA Request

Fee benefit requested

Fee waiver requested

Dear FOIA Officer:

This is a request pursuant to the Freedom of Information Act, 5 U.S.C. § 552.

We request access to and copies of:

(1) Any and all responses to and inquiries or communications concerning TSA Request for Information (RFI) TSA25-04-03472, “Requirements and Capabilities Analysis (RCA Office) Alternative Verification of Identity Requirements and Capabilities Analysis (RCA Office) Alternative Verification of Identity”, as posted online at <https://beta.sam.gov/api/prod/opps/v3/opportunities/resources/files/902095c2eb274282b84047c261898e45/download?api_key=null&token=>>, including but not limited to any messages pertaining to this RFI received at SRABriskintake@tsa.dhs.gov. According to this RFI, “Written responses shall be submitted no later than Friday, August 28, 2020 at 2:00pm Eastern Daylight Time to SRABriskintake@tsa.dhs.gov.”

(2) Any summary, assessment, report, action, or proposal or recommendation for action concerning one or more of the responses to RFI TSA25-04-03472.

(3) The entirety of any document or electronic file containing any records responsive to any portion of the request described in clauses 1-2 above (so that no portion of any document or file containing any responsive portions should be withheld as “unresponsive”).

(4) Any and all records of internal metadata contained in files responsive to any portion of the request described in clauses 1-3 above.

(5) Any and all records of filesystem metadata pertaining to files responsive to any portion of the request described in clauses 1-3 above, including but not limited to any records of (a) the filename of each responsive digital record, as it was found on TSA contractor, or other third-party workstation, server, storage device, or media; (b) the size of each such file in bytes, KB, MB, or GB; (c) the name or other label or identifier of the workstation, server, storage device, or media on which the file was found; (d) the path to the file in the filesystem on which it was found; and (e) the file date(s) as recorded in the file, in that filesystem, and/or in any label(s) on physical devices or storage media.

We request that all responsive records be provided in text-searchable, unencrypted electronic form. With respect to any records held in electronic form, we request that each such record be provided in the form of a discrete file with the same name and file format as the file is held by or on behalf of the TSA, as a complete bitwise digital copy of the original word processor file, PDF file, e-mail file, or other electronic file, including any file headers, embedded metadata, and all other file content,

For example, if records of responsive e-mail messages are held in the form of “.eml” files, we request that each such file be produced in the form of a “.eml” file with the same filename and format. Similarly, if responsive records of e-mail mailboxes are held in the form of “.mbx” files, we request that each such file be produced in the form of a “.mbx” file with the same filename and format.

We request that any responsive records of e-mail messages be produced in the form and format of the raw “message source” files, including full addresses and all headers and attachments, as those message source files are held on mail servers or backup or archival digital storage media.

We specifically request that you not create new documents or files in response to this request; not create “documents” such as page-view images or print views from

digital records; not substitute such newly-created “documents”, images, or views for requested records held by you as digital files; and not split one file into multiple files or combine multiple files into one file.

If all or any part of this request or searches for responsive records are referred or delegated to other agencies, contractors, offices, or staff, we request that any referral, delegation, or search tasking instructions specifically include my request with respect to the form in which records are to be produced, so that records are not inadvertently converted to, or produced in, other forms or formats.

As representatives of the news media we are only required to pay for the direct cost of duplication after the first 100 pages. Since most if not all of the responsive records are electronic files, not documents, and do not consist of paper pages, we expect that actual costs of electronic duplication will be negligible. Through this request, we are gathering information on TSA plans, practices, and partnerships with other entities that is of current interest to the public as part of widespread public interest in current and potential identification practices and requirements for air travel by common carrier.

This information is being sought on behalf of The Identity Project (“IDP”). IDP is a program of the First Amendment Project, a nonprofit organization providing legal and educational resources dedicated to protecting and promoting First Amendment rights.

This information will be made available to the public. The principal activity of IDP is publication of the informational and educational Web site at <http://www.papersPlease.org>, where we have published documents obtained in response to our previous FOIA requests and reports on TSA policies and practices.

Please waive any applicable fees. Release of the information is in the public interest because it will contribute significantly to public understanding of government operations and activities. The records we are requesting clearly relate to government operations and activities. It is in the public interest for the public to know what TSA is considering doing and what systems are being proposed by contractors to the TSA.

If our request is denied in whole or part, we ask that you justify all deletions by reference to specific exemptions. We will also expect you to release all segregable portions of otherwise exempt material. We, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees. Please respond as soon as possible to confirm your receipt of this request. We look forward to your complete reply within 20 business days, as the FOIA statute requires.

Sincerely,

Edward Hasbrouck
Consultant on travel-related civil liberties issues
The Identity Project (PapersPlease.org)