



Canadian Air Transport
Security Authority

99 Bank Street
13th Floor
Ottawa, Ontario
K1P 6B9

Administration canadienne
de la sûreté du transport aérien

99, rue Bank
13^e étage
Ottawa (Ontario)
K1P 6B9

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Steven Morgan
Director General, Audit and Review
Office of the Privacy Commissioner of Canada
Place de Ville
112 Kent Street
Ottawa, ON K1A 1H3

Dear Mr. Morgan:

This letter is in response to your correspondence of October 29, 2009, in which you provided comments regarding the Privacy Impact Assessment the Canadian Air Transport Security Authority (CATSA) completed in anticipation of the deployment of millimetre wave (MMW) screening technology at selected Canadian airports.

We wish to thank you for your comments and can confirm that your recommendations align with CATSA's implementation model for the MMW screening technology. More specifically, with regard to comments you provided in accordance with the ten privacy principles of the Canadian Standards Association Model Code for the protection of Personal Information, we note the following:

1. Accountability

Standard Operating Policies for the use of the MMW screening system along with the compliance and oversight framework will be completed before the equipment is deployed at selected airports.

2. Identifying Purposes

CATSA has prepared communication materials to explain the MMW screening system to travellers. Notice identifying the purpose of the screening process will be available at the airport security checkpoints equipped with the technology.

CATSA will also work with Transport Canada to ensure that information is conveniently available to travellers seeking information.

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3. Consent / Notification

CATSA will continue to ensure that images presented in the communication materials are accurate presentations of the images obtained during the MMW screening process to ensure informed consent.

CATSA will limit the use of the MMW screening technology to adults who are voluntarily providing their consent.

4. Limiting Collection

CATSA confirms that no information other than the transitory image generated by the MMW technology will be collected.

5. Limiting Use, Disclosure and Retention

CATSA confirms that the transitory images generated during the MMW screening process will only exist during the time it takes a Screening Officer to resolve an alarm. They will be immediately and permanently deleted once the alarm is resolved. During the Kelowna trial, the average time required to resolve an alarm was 1:08 minutes.

6. Accuracy

CATSA confirms that images generated by the MMW technology are of the individual standing in the unit. Any anomalies noted by the Image Screening Officer in the remote viewing room will be further investigated by a screening officer at the checkpoint.

7. Safeguard

CATSA will undertake an IT threat and risk assessment for the basic fixed configuration of the MMW equipment chosen for deployment. The configuration will remain identical for all installations.

8. Openness

CATSA will develop and publicize a complete information package specific to the use of the MMW screening technology.

9. Individual Access


CATSA confirms that images generated during the MMW screening process will be immediately and permanently deleted and as such, it will not be possible for CATSA to provide access.

10. Challenging Compliance

CATSA currently tracks and report to senior management comments, complaints and concerns for all areas within its mandate. The deployment and operations of MMW technology will be tracked and reported using the methods.

In conclusion, we would like to thank you for your continued cooperation in this process and take the time to reaffirm CATSA's commitment to continually strive to achieve a reasonable balance between privacy and security for the travelling public.

Regards,



Véronique de Passillé
Coordinator, Access to Information and Privacy

c.c.: Martin Corrigan, Director, Screening Technologies, CATSA