API and PNR: From the Airlines’ Perspective

ICAO Regional Facilitation Seminar
13th October 2014 - Paris
Objectives

- List the mutual benefits of implementing API and PNR programs which are compliant with global standards
- Outline the challenges in the development and implementation of API and PNR programs
- Discuss the impact of data privacy legislation
- Explain the steps/timings for an airline to set up an API or PNR program
Why implement API and/or PNR programs?

- Enhances border protection and national security
- Facilitates the entry and exit of legitimate travellers and crew
- Provides a solution to cope with the growing numbers of air passengers crossing our borders
  - In 2013: Air carriers carried 3.129 billion passenger, or over 8 million passengers every day
  - 2014: IATA forecasts a 5% growth, or an additional 400,000 more passengers every day
Challenges developing API/PNR programs

- IATA/ICAO/WCO have developed standard formats for both API and PNR
  - API standard: UN/EDIFACT
  - PNR standard: PNREGO

- Air industry continues to receive requests from governments to share API or PNR data via non-standard methods:
  - Email
  - Fax
  - Printouts from carrier’s systems
  - Direct access to carrier’s reservation system
Challenges developing API/PNR programs

- Requests for information which does not exist in the passport’s machine readable zone, or which are not included in the current standard
  - Passport issue date
  - Weight of baggage
- Requests for API transmissions prior to departure
- Requests from multiple governments at the same time
- Requests from multiple agencies within the same government for the same data, at the same time
  - Single-window concept
Challenges developing API/PNR programs

- No implementation guide provided
- Requirements changed after programming has started
- Unrealistic deadlines
- No prior consultation with IATA and airlines
- Requests for API and/or PNR data without any legislation to back up the mandate
- Lack of bi-lateral agreements with other governments in respect of PNR data transfer
Additional considerations

- Application of same requirements to all modes of transport
- Cost – both to government and transportation companies
- Government system requirements:
  - Effective
  - Fast
  - Redundant
  - Sized-right
  - System outage procedures
  - Error reporting
- Recognition that errors will occur, both technical and human
PNR – The *Conundrum*

- One government passes a law requiring PNR data be provided by air carriers
- Another government has a law which restricts or prohibits the transfer of personal data via electronic means
- The *Conundrum*: air carriers find themselves in the proverbial “stuck between a rock and a hard place”
PNR – The *Conundrum*

- Nearly all countries have regulations that restrict the release of personal data.
- Data privacy advocacy groups are continuously pushing for expanded data privacy protection.
- Recent revelations regarding data privacy breaches and allegations of spying have not made matters easier.
PNR – The impact on airlines

- The industry will, and does, share data where allowed
- The industry collaborates with states to address data privacy challenges
- However, airlines cannot, and will not, violate laws in place at either end of the journey to satisfy a law in place at the other
- The lose-lose scenario: penalties, or market withdrawal
PNR – How to best avoid the Conundrum

- PNR program should limit the type of data required, and avoid sensitive personal data
- States must adopt clearly defined regulations which detail what data will be required, when it is to be provided, how it will be used, and how it will be protected
- Seek solutions through direct government-to-government dialogue early in the process
- Establish reasonable timeframe for implementation and take into account possible delays in government-to-government negotiations
Multiple requests from governments/states

- Major efforts under way:
  - Russia: API and PNR
  - Brazil: API and PNR
  - Japan: PNR push to Customs
  - Indonesia: API
  - Philippines: API, PNR anticipated
  - Malaysia: API
  - Vietnam: API
  - UK: API and PNR on select routes
  - China: d-Declaration (combination of a range of requirements)
  - Australia: PNR, and data quality initiatives
Anticipated in 2015

- France: API and PNR
- EC: Multiple additional PNR Push requirements
- Guatemala: API
- Bolivia: API
- Peru: iAPI
- Ireland: PNR
- Canada: Development of outbound API and iAPI
How airlines prioritise

- Typically, most critical markets will take priority
- Potential financial liabilities for failure to meet project timelines considered
- Ability to meet one program’s requirements more easily also considered
- Finally, consideration also given to whether a market can be abandoned if potential liabilities are too severe
Airline Process: Announcement to Activation

- Evaluate program scope based on available information
- Obtain full technical specifications and determine programming needs (even for aligned programs)
- Obtain funding
- Conduct programming on host system
- For API only, develop software for check-in applications
- Undergo connectivity testing with receiving authority, or contracted government agent/service provider
- Ensure airport staff training is completed
- Activate and monitor system
Impacts if non-standard request

- It will take longer to prepare for activation.
- New data requirements may expand man-hour requirements immensely for basic programming.
- Airlines must ensure compatibility with other systems.
- Significantly more testing will be required.
- Average 90 to 120 day window can expand to 180+ days for simple message reconfigurations.
- Future changes may also be more difficult to make.
Suggestions for consideration

- Realistic timeframes should be established
- States need to remain aware of possible conflicts
- States should prepare for phased implementation
- Some carriers will be ready sooner than others
  - Not all will be starting from the same place
  - Some will take longer for system enhancements/programming
  - Consideration on when carriers go live should be based on communication and efforts shown
  - Extensions to go live dates should be granted with just cause
API and PNR – The future

- Collaboration with other countries to improve border control
- Development of “Known Traveller” programs which are recognised by other countries
- Enhanced border control processes
  - Expedited inspections
  - Automated inspection lanes
  - Elimination of bag check
API and PNR – In conclusion

- Understand the risk to your border, and determine what you really want API and/or PNR programs to accomplish before deciding which to enforce
- UN/EDIFACT and PNRGOV are the standard message formats for API and PNR data
- Collaborate with IATA, regional and local airline associations, airline stakeholders and other governments as early as possible
- Be aware that local airline representatives are not API/PNR experts, and they will have to engage with their head office for guidance
- Recognise that every airline will be different
Any questions or comments?

Ally Shearer
Manager, Border Security and Facilitation
Virgin Atlantic Airways

ally.shearer@fly.virgin.com
+44 1293 737917