

The TSDB has already been scheduled as temporary under NARA Records Disposition Schedule Job No. N1-065-06-2. This schedule was approved on September 22, 2006. The retention period for the records in the TSDB is very long; they will generally be kept 99 years. The sole exception is when the NCTC receives authorization to delete individual records for expungement; however, these records will also be maintained for quite some time (i.e., 50 years after the expungement decision is approved). This should allow sufficient time to work with the custodial agency to resolve any issues regarding FOIA requests.

The rationale for making records permanent is to ensure that records with historical value endure; it is not to ensure that back-up, redundant copies of records exist. Agency records management offices are responsible for ensuring that back-up copies of records are available for use when originals (or a working set) are compromised or destroyed. These activities take place under their vital records program responsibilities as described in NARA's publication, *Vital Records and Records Disaster Recovery: An Instructional Guide*, which is located on our website.

With regard to your recommendation to make Item A3 (Secure Flight Program-Master File-Recorded Communication) permanent, NARA maintains they are appropriately scheduled as temporary for the reasons outlined in the appraisal memorandum and the following reasons: it would be difficult to extract any meaningful, overarching information about the Secure Flight system from these records and Secure Flight implementation issues will be documented for historical research elsewhere.

The Recorded Communication item covers recordings of conversations between airline employees and TSA employees while attempting to validate Secure Flight matching results. This activity may generate voluminous records that will not be indexed in any meaningful way for research. In addition, maintaining these records as permanent without the associated Secure Flight watch list matching data (as proposed) would not provide researchers with a very complete picture of how every individual flight boarding denial decision was made. These recordings do not contain complete information about each individual nor about each Secure Flight assessment.

NARA maintains that the Secure Flight program will be adequately documented for historical purposes by Item C on this schedule (Program Documentation) and the TSA's permanent policy and procedure records (as cited in the appraisal