



April 9, 2014

The Honorable R. Gil Kerlikowske
Commissioner
U.S. Customs and Border Protection
1300 Pennsylvania Avenue, N.W.
Washington, D.C. 20229

Dear Commissioner Kerlikowske,

New York–New Jersey airports are the busiest gateways to the United States. Between them, John F. Kennedy and Newark Liberty International airports process over 18 million incoming international passengers a year. JFK accounts for almost 13 million of those, making it the nation’s top airport for international arrivals.

However, for too long, our airports have experienced excessive Customs and Border Protection (CBP) wait times that not only hurt the economy but also negatively impacts both the region and country’s image when it comes to air travel.

In 2013 alone, JFK had the worst wait times of any airport, where incoming passengers regularly experienced two hour-plus lines, and at times waits that exceeded four hours. Newark did not fare much better, with an average maximum wait over an hour.

Last year, a United States Travel Association survey showed that 43% of international air travelers said they would not recommend a trip to the United States because of the entry process. Almost two-thirds said that alleviating long customs wait times would make the U.S. a more attractive destination.

Our organization appreciates the focus that the U.S. Customs and Border Protection has recently placed on addressing this problem, working with the aviation industry and other stakeholders to coordinate more closely on manpower needs, federal funding, and the deployment of new technologies.

We are beginning to see positive results because of these efforts. With Delta and Terminal One Group’s funding the initiative, almost 60 Automated Passport Control (APC) Kiosks designed to rapidly scan travelers passports have been installed at Terminals 1 and 4 at JFK.

A Global Gateway Alliance analysis last month demonstrated that the kiosks are helping cut wait times, in some cases significantly so.

Additionally, Senator Charles Schumer recently announced hundreds of new officers to increase manpower at JFK and Newark Customs which we believe will continue to help address the issue.

These advancements are a good start, but it is by no means time for a victory lap. We have a long way to go for our airports, airlines and most importantly millions of international passengers. In order to continue to improve the situation, the CBP and the aviation industry must take aggressive and productive steps to expand their efforts.

First, CBP must stop the practice of deploying officers to pre-clearance facilities at overseas airports that do not have significant domestic air carrier presence and passenger traffic to the United States. For example, Abu Dhabi sends an average of just 573 passengers a day to the United States, and U.S. airlines do not serve its airport. Yet, CBP recently opened a pre-clearance facility there.

To put that number in perspective, together JFK and Newark airports serve more international passengers than all of the pre-clearance locations combined. Our view is that given the significant problems we have faced with long customs lines, the agency's staffing and resources need to be focused in the United States first.

Second, the long term solution includes better coordination with airlines to deploy officers when and where they are most needed, expansion of new technology, and new management approaches.

Some specific ideas to meet these goals include:

More CBP officers in New York and New Jersey: Passenger demand continues to increase in our market. With JFK the largest global gateway for international airline travelers in the country, and Newark the fourth largest, the New York region should have more officers assigned and more booths staffed to keep up with this growing number of passengers.

Automated kiosks at all international terminals: Automated Passport Control (APC) Kiosks for incoming passenger data collection are showing real signs of helping to ease wait times. The kiosks should be expanded to the additional international terminals throughout our airports – including Terminals 7 and 8 at JFK and Terminal B at Newark. This measure should be fast-tracked given the prior success with the program. With JFK's Terminal 5 opening to international arrivals next year, there should be an immediate plan to bring these kiosks there. What better way to kick off the international terminal than a smooth and most importantly fast experience at customs.

On-call CBP rapid response teams: There should be on-call rapid response teams at busy airports in case any particular customs line becomes too long for the passengers or the officers. In particular, the New York area would benefit from crisis response teams that could circulate between the numerous international arrivals terminals at JFK and Newark, and between the two airports, rather than the current rules that restrict officers to one assigned terminal.

CBP Data transparency: CBP has made real progress in increasing publicly available data in recent years, including an improved website and mobile applications. The next step is to replace the monthly wait time data with real-time, comprehensive, and readily accessible wait time information available to passengers and stakeholders.

CBP administrative duties not assigned to officers: In order to help reallocate resources where needed, part-time shifts should be permitted and administrative personnel should be added to the peak shifts to handle duties other than processing travelers, so officers can man booths and move passengers more efficiently.

We are confident in, and appreciate, CBP's dedication to protecting the security of U.S. borders, and to serving international passengers efficiently. We look forward to working with you to implement the initiatives that will ensure shorter, more manageable customs wait times for both New York and New

Jersey airports. This will go a long way in welcoming visitors to America and showing them that long wait times at our airports are a thing of the past.

Sincerely,

Joe Sitt

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CEO, Thor Equities

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Vice-President, GGA
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