

Exhibit 8
Declaration of Rory Doyle

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION CENTER)

Plaintiff,)

v.)

) Case No. 1:10-cv-1992 (ABJ)

THE UNITED STATES DEPARTMENT OF)

HOMELAND SECURITY,)

Defendant.)
_____)

DECLARATION OF RORY DOYLE

I, Rory Doyle, hereby declare as follows:

1. My name is Rory Doyle. I am the Product Manager for Smiths Detection Ireland, Ltd. ("Smiths Detection").

2. Smiths Detection's location in Ireland is the lead development site for the eqo AIT product. This site has many years of experience in the development and deployment of millimeter-wave AIT systems.

3. I understand that the Transportation Security Administration ("TSA") received a Freedom of Information Act ("FOIA") request that included, among other things, a request for a copy of a Smiths Detection CEI Radiation Safety Report dated December 11, 2008 pertaining to the Smiths "eqo" system. This document was Bates-stamped TSL1361-1378.

4. Certain limited portions of this report on pages TSL1367, TSL1368, and TSL1369 have been redacted to remove measured results in the radiation safety report and measurements that could be used to derive such values. As described further below, release of these testing results would allow competitors to use Smiths Detection's proprietary and confidential information to the competitive harm of Smiths Detection.

5. The marketplace for the type of products at issue here is highly competitive with a limited number of players. Any insight into Smiths Detection's technology approach would significantly impact Smiths Detection in future competitions. Test data presented in this report could be used to deduce or infer operational or performance attributes of the product. In particular, the report details the measurement reading from specified locations around the equipment and in the scan volume. This combination of readings and locations could be used to reconstruct a technically accurate operational description of the scanning approach used in eqo. The availability of this information could reveal company secret aspects of the system and unduly compromise the intellectual property associated with the product. The release of these data would provide a competitive advantage to third parties against Smiths Detection.

6. The actual values of the radiation emitted by the Smiths eqo system provide a comparative reference that could be used by Smiths Detection competitors to the material prejudice of Smiths Detection. For example, a competitor could infer eqo system attributes to gain a competitive advantage.

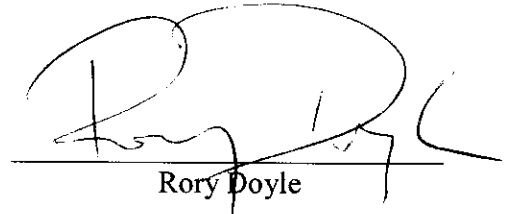
7. All of the material withheld is from third party reports that have been supplied to the government.

8. At present, AIT is at the early entry phase in many global markets. Smiths Detection has not yet been awarded a government contract for the specific data at issue. As a result, the data is competition sensitive. Disclosure would harm Smiths Detection proprietary interests, as discussed above.

9. Smiths Detection does not release the type of data at issue here outside the government except to third parties that have entered into non-disclosure agreements or similar confidentiality agreements with Smiths Detection. The information is not publicly available.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of September 2011.



Rory Doyle