

Declaration of Petitioner Bruce Schneier

BRUCE SCHNEIER

101 E Minnehaha Parkway, Minneapolis, MN 55419

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

THE ELECTRONIC PRIVACY INFORMATION)
CENTER, et al.,)

Petitioners,)

v.)

THE UNITED STATES DEPARTMENT OF)
HOMELAND SECURITY, et al.)

Respondents.)

No. _____

DECLARATION OF BRUCE SCHNEIER

I, Bruce Schneier, declare as follows:

INTRODUCTION

1. I am a recognized expert in security technology, both computer security and more general technological security, and have published several books and numerous articles on this topic.

2. I am a recognized expert in aviation security, have reviewed security protocols, and have participated in expert panels organized by the Transportation Security Administration (“TSA”) and others.

3. On Tuesday, June 8, 2010 I was scheduled to depart Boston Logan International airport on Delta flight 6761 from Boston to Washington Reagan.

4. At approximately 11:17 AM I entered TSA security at Boston Logan International Airport in Terminal 1.

5. I watched a single TSA officer at the head of the line, telling some people to go through the Full Body Scanner, and others to go through the traditional magnetometer. I

could discern no reason for telling people to go through which screening procedure, other than a desire to move people through security as quickly as possible.

6. When I got to the head of the security line, I was instructed by the TSA officer to go through a Full Body Scanner device, operated by the TSA.

7. I was not verbally notified by any TSA official that the Full Body scan was optional or that there was an alternative security screening procedure.

8. I did not observe any written notice or signage that indicated the Full Body scan was optional or that there was an alternative security screening procedure.

9. Based on this experience, I have no reason to believe that any traveler who went through security screening at Logan Airport at that time would have been told that the Full Body Scan was optional or that there was an alternative security screening procedure.

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

By: 

BRUCE SCHNEIER

On behalf of himself

