Attn: Department of State Desk Officer Office of Information and Regulatory Affairs Office of Management and Budget 725 17th Street, N.W. Washington, DC 20503

Bureau of Consular Affairs, Visa Office U.S. Department of State 2201 C Street, N.W. Washington, DC 20520

October 2, 2017

Re: <u>82 Fed. Reg. 36180, OMB Control No. 1405-0226; Supplemental Questions for Visa Applicants</u>

Dear Sir or Madam:

The undersigned organizations write to express our serious concerns about the Department of oposed policy

on any travel to an ISIS-controlled territory. Travel information from applicants must include travel and even potentially domestic travel.

First, the request for fifteen

they will be held a

This is to say nothing of the challenges posed by non-verbal communication on social media. On Facebook, for instance, users can react to a posting with a range of emojis. The actual meaning of these emojis is highly contextual. If a Face

II. The Proposed Collection Will Primarily Burden Applicants on the Basis of National Origin

The burdens detailed above would be substantial regardless of the faith or ethnicity of a visa applicant. While the State Department has stated that

society, and legitimate military targets.³⁴ It is difficult to see the connection between a visito s view of the role of women in society and terro

at Muslims, that assurance seems less than credible.

III. Information Collection may Facilitate Bulk Data Mining and Algorithmic Analysis Efforts that Amplify Privacy and Discrimination Concerns

While the ICR

what those efforts will consist of or how the State Department will use or store the data it obtains. Will it be able to analyze such large amounts of data? If so, through what means, and based on what criteria? Presumably this information about visa applicants from around the world will be recorded in government databases; for what purposes will these databases be used? Exploiting this data for bulk mining or algorithmic analysis would further amplify many of the privacy and discrimination-oriented concerns highlighted above.

The sensitive applicant information collected would likely be shared with the Department of Homeland Security, which may use the information as an input into new technological tools it wants developed as part of an 43 For this initiative, the Department of Homeland Security reportedly intends

in President cutive Order 13780.⁴⁴ Vetting would be dynamic: this computerized system would attempt to the country using information

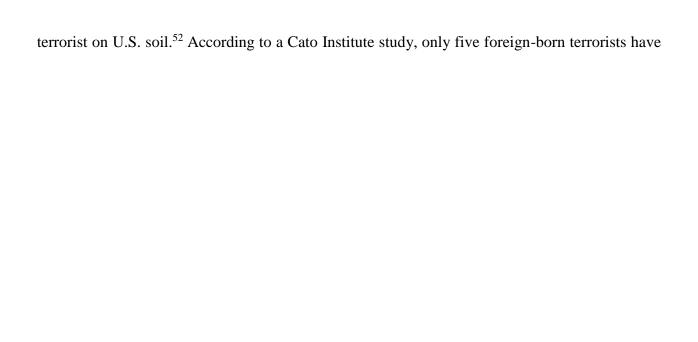
[and] internet

sites. 45

positively contributing member of society as well as their ability to contribute to national ⁴⁶ Naturally, the program would seek to predict whether those entering the U.S. intended

⁴³ See, e.g. State Department, 60-Day Notice of Proposed Information Collection: Supplemental Questions for Visa Applicants, 82 FR 36180, 36181 (Aug. 3, 2017)

 $[\]underline{https://www.federalregister.gov/documents/2017/08/03/2017-16343/60-day-notice-of-proposed-information-collection-supplemental-questions-for-visa$



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