



Transportation
Security
Administration

Question & Answer

TWIC Q&A

GENERAL

How was TWIC created?

Congress, through the Maritime Transportation Security Act, or MTSA, directed the federal government to issue a biometric transportation security credential to any individual with unescorted access to secure areas of facilities and vessels and all mariners holding Coast Guard issued credentials or qualification documents. Controlling access to secure areas is a critical component of the Department of Homeland Security's (DHS) efforts to enhance port security.

What is TWIC?

TWIC is a common identification credential for all personnel requiring unescorted access to secure areas of MTSA-regulated facilities and vessels, and all mariners holding Coast Guard-issued credentials. TSA will issue workers a tamper-resistant "Smart Card" containing the worker's biometric (fingerprint template) to allow for a positive link between the card itself and the individual.

How will the TWIC be used?

During the initial rollout of TWIC, workers will present their cards to authorized personnel, who will compare the holder to his or her photo, inspect security features on the TWIC and evaluate the card for signs of tampering. The Coast Guard will verify TWICs when conducting vessel and facility inspections and during spot checks using hand-held scanners, ensuring credentials are valid. A second rulemaking, anticipated in calendar year 2007, will propose enhanced access control requirements, including the use of electronic readers by certain vessel and facility owners and operators.

Will TWICs be used for access control?

Yes. Upon the effective enforcement date for their Captain of the Port (COTP) Sector, owners and operators will be required to visually inspect the TWIC for each worker granted unescorted access to secure areas of a facility or vessel. Also, some owners and operators have elected to integrate TWIC cards into their existing access control systems, although owners and operators are not required to purchase, install, or maintain card readers until technologic and logistic improvements are complete and are included in a second rulemaking. The Coast Guard will conduct checks using handheld readers to confirm the identity of TWIC holders during regular inspections and spot checks. A second regulation will propose card reader requirements that utilize all of the unique technologies employed in the TWIC.

Where can I read the TWIC rule?

The TWIC final rule is available on TSA's website [here](#) and more information on port security is available at the U.S. Coast Guard's Homeport site [here](#). It can also be accessed at the DOT Docket Management system [here](#), by searching on docket number 24196 and document number 857.

Was the public involved in the rulemaking?

Yes. In addition to direct involvement from the National Maritime Security Advisory Committee, TSA and the U.S. Coast Guard held four public meetings around the nation and received more than 1,900 comments from workers, port owners and operators, small businesses and others who would be affected by the new program. All comments were carefully considered and significant changes to the NPRM were made in the development of the final rule.

What is the implementation schedule?

TWIC enrollment will begin October 16, at the Port of Wilmington and will be phased in over the course of 2007 and 2008. We will post the implementation schedule when it is completed. Owners and operators of vessels will be required to comply with the provisions of the final TWIC rule by September 25, 2008. Compliance for facilities will be phased in by Captain of the Port zone (COTP), and the compliance date for each zone will be published via notice in the Federal Register 90 days prior to the compliance date.

Who can I contact to get more information on TWIC?

The TWIC Program Help Desk is operational and can be reached at **1-866-DHS-TWIC (1-866-347-8942)**.

What measures are in place to protect small businesses, such as small passenger vessels?

TSA and the Coast Guard worked with the Small Business Administration to minimize adverse financial and operational impacts on small businesses wherever possible. The rule includes provisions that allow MTSA-regulated passenger vessels (excluding cruise ships) to establish employee access areas for crewmembers who do not require unescorted access to secure areas such as the pilot house and engine room. Employee access areas are areas that support the passenger areas, and crewmembers who are typically in these areas are waiters, entertainers, and galley staff. This provision reduces the impact on employees who rarely need to use spaces beyond those designated for support of passengers, while maintaining the integrity of a vessel's secure areas.

Other measures include the production and distribution of a Small Business Compliance Guide, temporary access provisions for newly hired employees, an informational web site and a live help desk to assist small businesses with compliance through successful implementation of the program.

What are secure areas, passenger access areas, employee access areas, and public access areas?

Secure area means the area on board a vessel or at a facility or outer continental shelf facility over which the owner/operator has implemented security measures for access control in accordance with a Coast Guard approved security plan. It does not include passenger access areas, employee access areas, or public access areas.

A ferry, passenger vessel, or cruise ship may designate areas within the vessel as passenger access areas. A passenger access area is a defined space, within the secure area, of a ferry, passenger vessel, or cruise ship that is open to passengers. It is not a secure area and does not require a TWIC for unescorted access. If passenger access areas are designated, the owner or operator must maintain a visual representation onboard the vessel with the approved VSP detailing where these areas are located as required by 33CFR104.120(c).

A ferry, passenger vessel, excluding cruise ships, may designate areas within the vessel as employee access areas. An employee access area is a defined space, within the secure area, of a ferry or passenger vessel that is open only to employees and not to passengers. It is not a secure area and does not require a TWIC for unescorted access. Employee access areas may not include any areas defined as restricted areas in security plans. If employee access areas are designated, the owner or operator must maintain a visual representation onboard the vessel with the approved VSP detailing where these areas are located as required by 33CFR104.120(c).

A public access area is a defined space within a facility that is open to all persons and provides pedestrian access through the facility from public thoroughfares to the vessel. Any facility serving ferries or passenger vessels certificated to carry more than 150 passengers, other than cruise ships, may designate an area within the facility as a public access area. Public access areas should already be designated in the facility security plan as it is not a new addition to 33 CFR Subchapter H.

How do I know the information you collect on me is safeguarded?

Privacy and information security are critical to the TWIC program. Information collected at the enrollment center or during the pre-enrollment process, including the signed privacy consent form and identity documents, is scanned into the TWIC system for storage. Information is encrypted and stored using methods that protect the information from unauthorized retrieval or use.

ELIGIBILITY

Who must get a TWIC?

An estimated 750,000 individuals will be required to obtain a TWIC. This includes Coast Guard-credentialed merchant mariners, port facility employees, longshoremen, truck drivers, and others requiring unescorted access to secure areas of maritime facilities and vessels regulated by the Maritime Transportation Security Act.

Who can apply for a TWIC?

The following individuals are eligible to apply for a TWIC per 49 CFR 1572.105:

- A national (includes citizen) of the United States.
- A lawful permanent resident of the United States.
- A refugee admitted under 8 U.S.C. 1157.
- An alien granted asylum under 8 U.S.C. 1158.
- An alien in valid M-1 nonimmigrant status who is enrolled in the United States Merchant Marine Academy or a comparable State maritime academy. Such individuals may serve as unlicensed mariners on a documented vessel, regardless of their nationality, under 46 U.S.C. 8103.
- A nonimmigrant alien admitted under the Compact of Free Association between the United States and the Federated States of Micronesia, the United States and the Republic of the Marshall Islands, or the United States and Palau.
- A commercial driver licensed in Canada or Mexico who is admitted to the United States under 8 CFR 214.2(b)(4)(i)(E) to conduct business in the United States.
- An alien in lawful nonimmigrant status who has unrestricted authorization to work in the United States, except—
 1. An alien in valid S-5 (informant of criminal organization information) lawful nonimmigrant status;
 2. An alien in valid S-6 (informant of terrorism information) lawful nonimmigrant status;
 3. An alien in valid K-1 (Fiancé(e)) lawful nonimmigrant status; or
 4. An alien in valid K-2 (Minor child of Fiancé(e)) lawful nonimmigrant status.
- An alien in the following lawful nonimmigrant status who has restricted authorization to work in the United States—
 1. H-1B Special Occupations;
 2. H-1B1 Free Trade Agreement;
 3. E-1 Treaty Trader;
 4. E-3 Australian in Specialty Occupation;
 5. L-1 Intracompany Executive Transfer;
 6. O-1 Extraordinary Ability;
 7. C-1/D, Crew Visas;
 8. B1/OCS Business Visitor/Outer Continental Shelf;
 9. TN North American Free Trade Agreement; or
 10. Another authorization that confers legal status, when TSA determines that the legal status is comparable to the legal status set out in paragraphs 1-8.

What happens to my TWIC when my lawful nonimmigrant status expires?

The applicant must report the disqualifying condition to TSA and surrender the TWIC. In addition, the TWIC becomes invalid. If the applicant is in one of the permissible visa categories listed in 2.2(i), and the employment for which the visa was granted ends:

- The employer retrieves the TWIC from the applicant and provides it to TSA,
- The applicant surrenders the TWIC to the employer, or
- If an employer terminates an applicant working under a nonimmigrant status listed in paragraph 2.2(i), or the applicant otherwise ceases working for the employer, the employer must notify TSA within 5 business days and provide the TWIC to TSA if possible.

Will a non-U.S. citizen be able to get a TWIC?

Yes. The rule includes a list of various immigration categories that are eligible to apply for a TWIC, including nationals, refugees, asylees, lawful non-immigrants with unrestricted work authorization, and certain professionals with restricted work authorization.

What can disqualify me from getting a TWIC?

An individual who lacks lawful presence and certain immigration status in the United States, has a connection to terrorist activity, has been determined to lack mental capacity, or was convicted of the certain crimes will be ineligible for a TWIC.

What if I do not meet the qualification standards?

All applicants have the opportunity to appeal an Initial Determination TSA makes that an applicant does not meet the standards. TSA provides applicants the reason for the Initial Determination and instructions on how to apply for an appeal. Typical reasons for an appeal would be 'my conviction was later expunged,' or 'you have the wrong John Smith.' If an applicant knows that he or she does not meet the standards concerning criminal activity or mental capacity, or is in Temporary Protected Status at the time of enrollment, the applicant should note this during enrollment by initialing that they are applying for a waiver on the 'TWIC Application Disclosure Form.' If the applicant becomes aware that he or she does not meet the standards concerning criminal activity or mental capacity when TSA issues an Initial Determination, the applicant may apply for a waiver at that time as well.

What are the disqualifying crimes?

As identified in section 1572.103 of the final rule, they are:

- Permanent disqualifying criminal offenses ("Unlimited look back")
 1. Espionage or conspiracy to commit espionage
 2. Sedition or conspiracy to commit sedition
 3. Treason or conspiracy to commit treason
 4. A federal crime of terrorism (18 U.S.C. 2332(g)) or comparable State law
 5. A crime involving a TSI (transportation security incident). Note: A transportation security incident is a security incident resulting in a significant loss of life, environmental damage, transportation system disruption, or economic disruption in a particular area. The term "economic disruption" does not include a work stoppage or other employee-related action not related to terrorism and resulting from an employer-employee dispute.
 6. Improper transportation of a hazardous material under 49 U.S.C. 5124 or a comparable state law
 7. Unlawful possession, use, sale, distribution, manufacture, purchase...or dealing in an explosive or explosive device
 8. Murder
 9. Threat or maliciously conveying false information knowing the same to be false, concerning the deliverance, placement, or detonation of an explosive or other lethal device in or against a place of public use, a state or government facility, a public transportation system, or an infrastructure facility
 10. Certain RICO (Racketeer influenced and Corrupt Organizations) Act violations where one of the predicate acts consists of one of the permanently disqualifying crimes

11. Attempt to commit the crimes in items (a)(1)-(a)(4)
 12. Conspiracy or attempt to commit the crimes in items (a)(5)-(a)(10)
 13. Convictions for (a)(1)-(4) are not eligible for a waiver.
- Interim disqualifying criminal offenses -- Conviction within 7 years, or release from incarceration within 5 years of application, and indictments or wants/warrants associated with the crimes listed below until released:
 1. Unlawful possession, use, sale, manufacture, purchase, distribution...or dealing in a firearm or other weapon
 2. Extortion
 3. Dishonesty, fraud, or misrepresentation, including identity fraud and money laundering (except welfare fraud and passing bad checks)
 4. Bribery
 5. Smuggling
 6. Immigration violations
 7. Distribution, possession w/ intent to distribute, or importation of a controlled substance
 8. Arson
 9. Kidnapping or hostage taking
 10. Rape or aggravated sexual abuse
 11. Assault with intent to kill
 12. Robbery
 13. Fraudulent entry into a seaport
 14. Lesser violations of the RICO (Racketeer Influenced and Corrupt Organizations) Act
 15. Conspiracy or attempt to commit crimes in this paragraph (b)

How will I be notified to get a TWIC?

Facility and vessel owners/operators are required to inform employees of their responsibility to possess a TWIC and what parts of the facility and vessel will require a TWIC for unescorted access. The intent of this requirement is for owners/operators to determine which of their employees will need a TWIC and inform those employees in enough time for them to comply with the requirements.

Owners/operators are also encouraged, but not required, to provide this same information to personnel who are not facility or vessel employees, e.g. contractors, truck drivers. Coast Guard Captains of the Port will also be working with the local Area Maritime Security Committees to communicate enrollment center locations and scheduling, as well as TWIC requirements and compliance dates.

ENROLLMENT

What is the enrollment process?

The enrollment process consists of the following components: optional pre-enrollment, in-person enrollment, fee collection, security threat assessment and notification of the results, and issuance of the TWIC to the applicant. Applicants may pre-enroll online to enter all of the biographic information required for the threat assessment and make an appointment at the enrollment center to complete the process (although appointments are not required). Then applicants must visit the enrollment center where they will review and sign a 'TWIC Application Disclosure Form,' provide biographic information and a complete set of fingerprints, sit for a digital photograph, and pay the enrollment fee. The applicant must bring identity verification documents to enrollment and in the case of aliens, immigration documents that verify their immigration status, so that the documents can be scanned into the electronic enrollment record.

What documentation is required for a TWIC?

Applicants must provide the appropriate documents in order to verify their identity. They must provide one document from list A, or two from list B, one of which must be a government-issued photo ID:

List A

- Unexpired passport
- Unexpired Permanent Resident card or Unexpired Alien Registration Receipt Card with photograph
- Unexpired foreign passport with one of the following: I-551 Stamp; Attached INS Form I-94 indicating unexpired employment authorization; Unexpired Employment Authorization Document (I-766); Unexpired Employment Authorization Card (INS-688B); OR with one of the following Unexpired Visas: E-1, E-2, E-3, H-1B, H-1B1, L-1, O-1, TN, M-1, C-1/D
- Free and Secure Trade (FAST) Card
- Merchant Mariner Document (MMD)

List B (need two and one must be a government-issued photo ID)

- U.S. Certificate of Citizenship (N-560, 561)
- U.S. Certificate of Naturalization (N-550 or 570)
- Driver's license or ID card issued by a state or outlying possession of the United States
- Original or certified copy of birth certificate issued by a state, county, municipal authority, or outlying possession of the United States bearing an official seal
- Voter's registration card
- Consular Report of Birth Abroad
- U.S. Military ID or U.S. Retired Military ID
- U.S. Military Dependent's Card
- Expired U.S. passport
- Native American Tribal Document
- U.S. Social Security card
- U.S. Citizen Card I-197
- U.S. Military Discharge Papers DD-214
- U.S. Department of Transportation (DOT) medical card
- Civil marriage certificate

What if I do not have the required forms of identification or do not wish to sign the disclosure form?

Enrollment will not proceed at that time and you will not be able to obtain a TWIC. Applicants are required to present these documents as well as sign the 'TWIC Application Disclosure Form.'

Where do I go to enroll?

TSA will use a combination of fixed and mobile enrollment stations to make the enrollment process as efficient as possible for applicants and owners or operators. The enrollment locations and directions to these sites will be available on the TWIC website at www.tsa.gov/twic.

Is pre-enrollment currently available?

Pre-enrollment will be available after October 9, 2007 by clicking [here](#).

What is pre-enrollment?

The pre-enrollment process allows applicants to provide much of the biographic information required for enrollment; to select an enrollment center where they wish to complete enrollment; and to make an appointment to complete enrollment at the enrollment center of their choosing. Applicants are encouraged, but not required, to “pre-enroll.”

Are appointments required for enrolling?

Although applicants may schedule an appointment to complete enrollment at an enrollment center appointments are not required and walk-ins are welcome.

How long does enrollment take?

The enrollment process for a pre-enrolled applicant is expected to take approximately 10 minutes. The enrollment process for an individual who chose not to pre-enroll is expected to take approximately 15 minutes.

FEES

How much will port workers be charged for a TWIC?

The fee for TWIC will be \$132.50 and the credential is valid for five years. Workers with current, comparable background checks (hazardous materials endorsement, merchant mariner document, certificate of registry, merchant mariner license, or Free and Secure Trade (FAST) will pay a lower price of \$105.25. Payment must be made with credit card (Visa or MasterCard only), money order, or cashier's check.

If I have a comparable assessment, how can I determine which fee is more economical -- the reduced fee or the full, 5 year fee?

It is most beneficial for applicants who will use a comparable threat assessment and pay the reduced fee to do so within 14 months of receiving the comparable threat assessment (Hazmat endorsement, MMD, license, etc.). After 14 months, it is more cost effective to pay the full fee for TSA to complete the security threat assessment and issue a TWIC with an expiration date 5 years from the date of issuance.

What is the fee for a replacement card?

The card replacement fee (for lost, stolen, or damaged TWICs) is \$60.

SECURITY THREAT ASSESSMENT

What does the security threat assessment consist of?

The assessment includes checks against criminal history records, terrorist watch lists, and immigration status. If no adverse information is disclosed, TSA typically completes a security threat assessment in less than 10 days. However, processing time increases for an applicant with a criminal history or other disqualifying information, and is further lengthened if the applicant initiates an appeal or waiver. This security threat assessment is the same for those applying for, transferring, or renewing a HAZMAT endorsement (HME) on their state-issued commercial drivers licenses (CDLs).

Will the results of my threat assessment be shared with my employer?

If TSA determines that an applicant poses an imminent threat to transportation or national security, TSA may notify the applicant's employer. Generally, TSA will not provide the reasons for a disqualification to an employer. However, if TSA has reliable information concerning an imminent threat posed by an applicant and providing limited threat information to an employer, facility, vessel owner, or Coast Guard Captain of the Port would minimize the risk, then TSA would provide such information.

What if I have already completed a comparable threat assessment?

Applicants who have completed a comparable threat assessment, such as a hazardous materials endorsement, FAST card, merchant mariner's document (MMD), or merchant mariner license, and wish to pay a reduced TWIC fee because they do not need another threat assessment, must present their hazardous materials endorsement, FAST card, MMD, or merchant mariner license at enrollment. The TWIC expiration date for FAST, MMD, and merchant mariner license holders will be five years from the date on which those credentials were issued. The TWIC expiration date for HAZMAT endorsement (HME) holders will be five years from the date of the HME issuance.

WAIVERS AND APPEALS

Is there going to be an appeals and waivers process?

Yes. Applicants who are denied a TWIC will be notified of the reason for denial and instructed on how to apply for an appeal or waiver. All applicants have the opportunity to appeal a disqualification, and may apply to TSA for a waiver if disqualified for certain crimes, or if they are aliens in Temporary Protected Status. Applicants who seek a waiver and are denied may seek review by an Administrative Law Judge (ALJ). The applicant has 60 days from the time they receive a Final Determination of Threat Assessment to provide the required information to TSA for consideration.

CARD ISSUANCE

How will the cards be issued?

The applicant will be notified by email or phone, as indicated on the application, when his/her credential is available at the enrollment center. The applicant must return to the same enrollment center to pick up his/her TWIC.

How long is the TWIC card good for?

Generally, TWICs remain valid for five years, unless renewed before the five-year term ends. Upon renewal, an applicant receives a new credential and the old credential is invalidated in the TSA System. TSA does not plan to notify TWIC holders when their credential is about to expire because the expiration date is displayed on the face of the credential.

ROLL-OUT SCHEDULE

Will you rollout TWIC to all ports immediately?

No. The initial enrollment will be phased based on factors including risk, volume, type of cargo imported and exported, volume of passenger vessel activity, and the size of the local population.

Once enrollment begins, when will workers be required to have a TWIC?

The Coast Guard will publish TWIC compliance dates for each Captain of the Port zone (COTP) in the Federal Register. We expect this compliance date to closely follow the end of the initial enrollment period for the relevant COTP Zone. The Coast Guard will provide 90 days notice prior to the compliance date in a particular COTP. Facility owners and operators are responsible for ensuring that their employees are aware of enrollment and compliance dates.

What technologies are being used in the national rollout?

The TWIC will be a Smart Card (i.e., a card with a small integrated circuit chip embedded in the card) and will contain the following technologies:

- Dual Interface Integrated Circuit Chips (ICC) – a small computer chip that can be read by either inserting the card in a slot in a “contact” card reader; or, holding the card within 10 centimeters of a “contactless” card reader
- Magnetic Stripe – commonly found on the back of credit cards; read by “swiping” the card through a magnetic stripe card reader
- Linear Bar Code – commonly used to quickly identify items by scanning the codes with an optical reader—i.e. scanning grocery items at a checkout counter

Why was the Port of Wilmington selected to be first?

The Port of Wilmington participated in the prototype activities of the program. Leveraging this experience, as well as the size and location of the port, made it the appropriate choice to begin the rollout of this critical security measure.

STAKEHOLDER OUTREACH

What outreach will the federal government undertake prior to the start of enrollment?

TSA, the U.S. Coast Guard and its contractors have conducted extensive outreach to educate workers on the impact of this critical security program. This includes:

- More than 75 meetings with ports, unions, trade groups and others affected by TWIC
- Four formal public hearings for workers and industry
- A toll free contact center 1-866-DHS-TWIC (1-866-347-8942) to answer workers' specific questions
- A web site that includes an extensive question and answer section
- Signage, pamphlets and other port specific communications that will keep workers informed on enrollment dates and resources to answer their questions.

Over the next year, members of TSA and the Coast Guard will continue to meet with unions, associations, and other industry stakeholder groups to provide updates on the status of the program and will update materials on the TSA and USCG web sites. Small business guides for TWIC applicants and owners/operators are available [here](#). The **U.S. Coast Guard Navigation and Vessel Inspection Circular** (NVIC) is also available. The majority of stakeholder outreach efforts supporting the deployment of the program will be coordinated and carried-out by TSA's contractor, Lockheed Martin.

Who is providing outreach to the stakeholders for TWIC?

TSA, Coast Guard, and the Lockheed Martin contractor team are actively reaching out to unions, associations, and stakeholder groups to communicate and facilitate the TWIC enrollment process. Additionally, the TWIC Stakeholder Communications Committee (TSCC) has been developed to facilitate communication and rollout of the program nationwide.

MERCHANT MARINERS

Will these rules affect all Merchant Mariners?

Yes. All credentialed U.S. merchant mariners must obtain a TWIC.. This includes all persons holding a Coast Guard-issued merchant mariner's license, merchant mariner's document (MMD), Standards of Training, Certification and Watchkeeping (STCW) Certificate, or certificate of registry (COR). With the implementation of TWIC, the Coast Guard MMD would primarily serve as proof of the bearer's professional qualifications. The Coast Guard has drafted a supplementary proposed rule (published in the same Federal Register edition as the TWIC final rule) that proposes to combine the elements of all four current merchant mariner professional credentials into one certificate called the Merchant Mariner Credential (MMC). The Coast Guard and TSA are streamlining the process for the two credentials to reduce costs, duplication of effort, and processing time for mariners. If the MMC proposed rulemaking is finalized as currently written, the Coast Guard would begin issuing the MMC in September of 2008 and would phase in the replacement of mariner's current credentials over a period of five years. Mariners would be issued their credential in the form of an MMC at the time they renew their current credential, or when applying for a new credential. The proposed rulemaking would not affect the validity of a mariner's current credential.

How much will the MMC cost?

The cost of the MMC would be the same as the cost of the current mariner documentation. The only change would be the removal of additional issuance fees (\$45) as there would no longer be multiple credentials to issue.

What are the overall costs of the MMC?

We foresee the MMC adding no additional cost to mariners, and in fact, it should reduce the overall cost burden. Merchant Mariners would submit information required for the MMC at TWIC enrollment centers when they apply for their TWICs. Mariners would only need to visit one of the 17 Regional Exam Centers to take an examination, as the MMC would be mailed to the mariner after the TWIC is issued.

PROTOTYPE**How many transportation workers participated in the prototype evaluation?**

As of December 31, 2005, more than 4,000 workers were issued prototype TWICs. Participants in the Philadelphia and Los Angeles/Long Beach areas received TWICs after completing TSA-performed name-based threat assessment. Participants in the state of Florida underwent a criminal background check conducted by the state of Florida as well as the name-based assessment performed by TSA before being issued prototype TWICs.

Where did the prototype take place?

The prototype was conducted at 26 locations in the geographical areas of Los Angeles/Long Beach, Wilmington/Philadelphia and Florida's deepwater ports. Participation was voluntary for the prototype. Examples of participants included truck drivers, longshoremen, and container terminal and airport personnel.

During the prototype phase TSA tested the card in other modes of transportation. Will this credential be required for rail or airport employees?

The initial rollout of TWIC will be focused on the maritime mode, which will include rail workers and truck drivers who require unescorted access to secure areas of MTSA-regulated facilities, and vessel personnel. Once the initial maritime rollout is complete DHS will look at the possibility of requiring use of the credential in other modes of transportation.