

Norwegian Air Shuttle ASA
Oksenøyveien 3, P.O Box 115
NO-1330 Fornebu
Norway

Statement

SM064:00/2015

9.1.2018

SISÄMINISTERIÖ
INRIKESMINISTERIET
PL26
00023 Valtioneuvosto
FINLAND

STATEMENT ON THE PROPOSAL

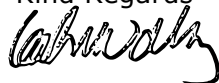
For the national Finnish legislation transposing the PNR Directive (EU) 2016/681
SM064:00/2015

Following the request to give a statement on the proposal for the national Finnish legislation transposing the PNR Directive, we have drafted the following notification regarding the part of the passenger data transmission:

1. As already informed in the draft document; airlines cannot be requested to send anything which is not already available in the Passenger Record (PNR). There is no way for airlines for example to collect information as a mandatory element in cases where it is not legally needed (e.g. passport information inside Schengen). (EU)2016/681 (8)
2. Payment method as existing in the PNR can be shared as also requested in this draft. However it should be noted that Credit Card information will only be sent as concealed data, never unconcealed. This is also accepted by other national authorities using PNR Push or planning to do so.
3. The proposed penalty against air carriers which do not transmit data as provided seems to be planned according to the PNR Directive and article 14. Once automatic data transfer is activated any failure can be detected but takes time to diagnose the cause of the problem. Therefore the time allowed for investigations and explanations by the air-carrier should be extended longer than two weeks now proposed as minimum.

Currently Norwegian's system provider Amadeus manages all data transfers and also PNR Push requested by several authorities. The proposal to fulfill the PNR Directive by Finnish authorities is well aligned with the EU Directive and can be supported by Norwegian as well.

Kind Regards



For Head of Commercial and Customer Service IT

