



Public Comment — BJL13 Enterprise Solutions LLC

Civil Rights and Privacy Objection

To: U.S. Citizenship and Immigration Services (USCIS) Docket No. USCIS–2025–0006 / RIN 1615–AC71 Subject: Comment on “Collection and Use of Biometrics by USCIS”

BJL13 Enterprise Solutions LLC submits this comment in opposition to the proposed rule expanding DHS biometric collection and retention authorities.

The proposed rule undermines public trust in government by normalizing the surveillance of both citizens and non-citizens without statutory necessity. Its scope—extending biometric collection to U.S. citizens, minors, and DNA data—exceeds congressional intent under the Immigration and Nationality Act. DHS’s reliance on broad “identity management” powers erodes traditional due process protections.

Expanding “biometrics” to include genetic and voice data introduces disproportionate risks of misuse, error, and discrimination. The rule offers no binding retention limits, independent oversight, or remedial mechanisms for misuse—core conditions for legitimacy in any rights-based framework.

The biometric expansion must be rescinded or substantially narrowed. DHS should confine collection to specific, statutorily defined categories and adopt independent oversight before implementation.

Respectfully submitted, Brian J. London, MPH(c) Managing Director BJL13 Enterprise Solutions LLC

Signature: _____
Date: _____