
POLISH BORDER GUARD



**Unit III
Passenger Information Unit
Investigative Department
Polish Border Guard Headquarters**

Guide for air carriers performing PNR flights

Version 1



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Introduction

The purpose for this guidelines is to provide the air carriers performing PNR flights with necessary information concerning the obligations arising from legal provisions that are in force on the territory of the Republic of Poland regulating the processing of passenger name records (PNR data) and the principles, methods and technical condition for transmission of PNR data to the Passenger Information Unit (PIU).

Glossary

According to art. 5 of the Act of 9 May 2018 *on the processing of passenger name records* (the Polish PNR Act; Journal of Law 2019 item 1783) **“an air carrier that organizes PNR flights shall transmit to PIU PNR data concerning passengers of the flight, from the category of PNR data that it collects in the course of its business activity in order to make a reservation or perform air transport.”**

Business activity should be understood as commercial service activity, carried out in an organized manner by an entity registered in the relevant company register (database / records).

Air carrier is an entity authorized to operate air transport on the basis of a concession – in case of a Polish air carrier – or on the basis of a relevant act of a competent authority of a foreign country - in the case of a foreign air carrier (art. 2.16 of the Aviation Law dated 3.07.2002). **An air carrier organizing flights** referred to in art. 5.1 of the PNR Act is an air carrier who concludes the contract of carriage with the passenger or person (entity) operating on his behalf, he plans this transport and for which data on the passenger's flight is collected for the purpose of booking or executing this flight.

PNR flight is a flight of an aircraft performing air passenger transport during which the border of a country is crossed and the departure or landing of said aircraft happens on the territory of Poland (does not apply to domestic flights on the territory of Poland).

Passenger Name Records (PNR data) means a record of each passenger's travel, including personal data, which is processed in connection with the business of air carriers for the purpose of booking / reservation or performing a flight as part of an air transport. Collected PNR data shall be transmitted by the air carrier to the PIU.



Air passenger transport is a flight or a series of flights during which an air carrier is transporting passengers for a remuneration including a contract for a temporary use of the aircraft (art. 2.13 of the Aviation Law dated 3.07.2002).

The scope of transferred PNR data

The air carrier transmits to the PIU only PNR data that he collects in the course of its business activity.

Transmitted PNR data should be consistent in the context of their structure with applicable standards and requirements specified by international associations IATA and ICAO in the guidelines, e.g. “*Passenger and airport data interchange standards (PADIS XML Implementation Guide – PNRGOV Message)*.”

Please keep in mind that one of the primary elements required for transmitting each message containing PNR data is the PNR reservation number (*BookingRefID*).

The PNR data includes the following categories of data:

1. PNR record locator;
2. Date of reservation / issue of ticket;
3. Date(s) of intended travel;
4. Name(s) and surname(s);
5. Address and contact information (telephone number, e-mail address);
6. Information on the payment for the ticket, including the payment card number, cash payment information, information on the invoice or other proof of payment for the ticket and information contained in the transfer order: bank account numbers of the sender and recipient, first and last name or sender's name and the recipient, amount and currency of the transfer, date and time of transfer and its title;
7. Complete travel itinerary for specific PNR;
8. Frequent flyer information;
9. Travel agency / travel agent;
10. Travel status of passenger, including confirmations, check-in status, no-show or go-show information;
11. Information on:
 - a) separation of PNR data, including information on a change of booking made for more than one person in the area of indicating a new direction of flight for at least one of them, or

- b) dividing PNR data, including information on a change of booking made for more than one person in the scope of indicating a new direction of flight for all persons covered by it;
12. General remarks including all available information on unaccompanied minors under 18 years, such as name and gender of the minor, age, language(s) spoken, name and contact details of guardian on departure and relationship to the minor, name and contact details of guardian on arrival and relationship to the minor, departure and arrival agent;
 13. Ticketing field information, including ticket number, date of ticket issuance and one-way tickets, automated ticket fare quote fields;
 14. Seat number and other seat information;
 15. Code share information;
 16. All baggage information;
 17. Number and other names of travelers on the PNR;
 18. Any advance passenger information (API) data collected (including the type, number, country of issuance and expiry date of any identity document, nationality, family name, given name, gender, date of birth, airline, flight number, departure date, arrival date, departure port, arrival port, departure time and arrival time);
 19. All historical changes to the PNR listed in numbers 1 to 18.

Please keep in mind that according to art. 4.1.18 of the Polish PNR Act **API data are one of PNR data category and are subjected to be transferred to the PIU**. They can be send as part of the PNR data message or as a separate API data transmission.

API data are subjected to transmission to PIU in case when they are collected by the air carrier or on his behalf by another related entities. If processing of API data by other entities (e.g. Departure Control System, handling company, provider) does not take place for the benefit of the carrier concerned, i.e. it is not due to his needs, is not carried out on his behalf, but for other reasons beyond his control (e.g. airport security policy, lack of an airline's online check-in system), they are not subject to transfer to PIU.

Timeframes for PNR data transmission

According to art. 6 of the Polish PNR Act, PNR data are transferred to the PIU in two following timeframes:

- 1) **from 48 to 24 hours before the planned start of the PNR flight (T:48-24),**

2) **immediately upon completion of the check-in and boarding of passengers on board an aircraft, when passengers are no longer able to board or leave the aircraft before it starts (T:0).**

Air carrier making non-scheduled flights (*ad hoc*) that does not have the PNR data 24 hours before departure, transmits the gathered PNR data only in the second timeframe (T:0).

PNR data provided in the second timeframe (T:0) should reflect the actual status of the passengers on board of the aircraft.

According to art. 7.1 of the Polish PNR Act **the PIU on behalf of an competent authority may request that the air carrier provides PNR data in a different timeframe or in specific timeframes mentioned in the request (other than T:48-24 and T:0).** In such case the PIU may exempt the air carrier from the obligation to transmit PNR data in the timeframes mentioned in art. 6.1 of the Polish PNR Act. This fact is noted in the request addressed to the carrier.

Timeframes preferred by PIU for PNR data transmission are:

- **25 hours before aircraft take-off for the first PNRGOV message,**
- **ATD (actual time of departure) for the second PNRGOV message.**

If API data (in the context of PNR flight) are from DCS systems (Departure Control System), but it is not possible to synchronize them with the reservation system from which the PNRGOV message originates, transfer them using a separate channel using the EDIFACT PAXLST format in the timeframe ATD. Each time a PNRGOV message is sent, it must contain a full set of data (the so-called *full PNR*).

Data formats

The National Informatics System (KSI PNR) supports following PNR data formats:

- EDIFACT PNRGOV - version 11.1 and later,
- XML PNRGOV - version 13.1 and later,

In the case of **API data** sent separately from the PNRGOV message:

- EDIFACT PAXLST - version from 2003 and later.

Transmission protocols

Transmission protocol	Environment	EDIFACT PNRGOV	XML PNRGOV	EDIFACT PAXLST (API)
IATA TYPE-B	test	WAWPTXA	Does not apply	WAWSTXA
	production	WAWPPXA		WAWSPXA
IBM MQ	test	detailed configuration information will be provided in direct contact with KSI PNR system technical support		
	production			
AS4	test			
	production			

The following values should be used in the messages:

a) PNRGOV:

UNB Segment Interchange Recipient ID Element: **PLPIUPNR**

UNG Segment Application Recipient ID Element: **PLPIUPNR**

b) API:

UNB Segment Interchange Recipient ID Element: **PLPIUAPI**

UNG Segment Application Recipient ID Element: **PLPIUAPI**

Air Carriers Portal

“**Air Carriers Portal**” is an additional charge free channel for the transmission of PNR data shared and administrated by PIU Poland. It is a web page portal which allows the air carriers to transmit PNR data to the KSI PNR system manually or import them. Transfer of PNR data to the “Air Carriers Portal” is done by filling in the appropriate fields in the system or by importing data in one of the below mentioned formats:

1. EDIFACT file with API data in IATA format EDIFACT PAXLST D02B or higher,
2. XML file with API data in a format specified by PIU,
3. EDIFACT file with PNR data in IATA format EDIFACT PNRGOV 13.1 or higher,
4. XML file with PNR data in IATA XML PNRGOV 16.1 or higher format,
5. XLSX file with PNR data in a format specified by PIU.

In case when an air carrier wants to transmit data through the “Air Carriers Portal”, he has to inform PIU Poland by email (piu.pl@strazgraniczna.pl) that he wants to gain access to the said portal. Additionally in this message he has to provide an email address that will be linked with his account in the portal. Creating an account for the air carrier in the portal is done



immediately (generally in the same day that the air carrier provides the email address necessary for gaining access to the portal).

Detailed information concerning the use of the “Air Carriers Portal” are described in the document “Air Carriers Portal – application of the Border Guard designed to transfer PNR data” published on the “Public Information Bulletin of the Border Guard Headquarters” in the “Passenger Name Record” overlap.

Alternative ways (channels) for transmission of PNR data in emergency cases

Based on art. 8.4 of the Polish PNR Act the air carrier, which is a non-scheduled air carrier and which does not have a reservation system and appropriate infrastructure to handle the protocols and data formats specified above (i.e. **it is not possible to transmit PNR data to the KSI PNR system, including via the “Air Carrier Portal”**), **can transfer PNR data to PIU in accordance with a signed agreement with the Commander in Chief of the Polish Border Guard concerning the types of electronic communication by which PNR data will be transferred to PIU and the method of their security.**

In case that the transmission of PNR data is impossible due to technical issues (e.g. breakdown of the system), **the air carrier and PIU agree on another way of transmitting PNR data** (art. 8.5 of the Polish PNR Act). If the air carrier has a direct connection to the KSI PNR system for transmission of PNR data, the alternative way to submit required data is via the “Air Carriers Portal”. In connection to the air carriers transmitting PNR data through the “Air Carriers Portal” an alternative way to do so can be via an encrypted email or by using the ePUAP electronic inbox.

In the event of a technical issue on the side of the air carrier resulting in failure to transmit PNR data, in order to improve cooperation with the PIU, the air carrier fills out the Annex 4 and sends its copy (scan) to the PIU by email.

PIU expects that after an alternative way for transmission of PNR data is agreed on or the technical issue is fixed, **the air carrier will submit immediately all PNR data that he was obliged to transmit and that were collected during this time.**



Obligations of air carriers resulting from art. 10 of the Polish PNR Act

According to art. 10.1 of the Polish PNR Act the air carrier is obliged to inform the PIU in writing, no later than 14 days prior to the commencement of PNR flight, about:

- name and contact details of company (Annex 1),
- data format and transmission protocol used to transfer PNR data to PIU (Annex 2),
- schedules or flight programs (in a structured document containing: name of the air carrier, date of arrival/departure, time of arrival/departure, flight no, IATA/ICAO code of the air carrier, airport of arrival/departure). **Air carriers will meet this obligation when they submit to the PIU their seasonal schedule for regular flights** (including e.g. the "summer" season and / or the "winter" season). On the other air carriers who due to the nature of their operations, do not operate scheduled flights and do not set a schedule or schedules are not obliged to send the information in question to the PIU and update it.
- PNR data categories, which it collects (Annex 3).

In case that any information mentioned above have changed that air carrier informs the PIU about this fact immediately. Submitting the next seasonal schedule by the air carrier constitutes the implementation of the obligation for providing updated information on changes to previously established flight schedules.

Information referred to in art. 10 of the Polish PNR Act may be submitted to the PIU:

- by traditional mail (the method is proposed primarily for air carriers without representation / power of attorney (proxy) on the territory of Poland),
- as an electronic document - providing information via the electronic e-PUAP inbox or using an electronic signature (a document bearing a qualified electronic signature).

Contact details

Contact	E-mail / address	Phone / fax	Competence
PIU Poland	piu.pl@strazgraniczna.pl al. Niepodległości 100 02-514 Warsaw Poland	+48 22 513 55 00 Fax: +48 22 500 46 00 +48 22 500 46 01	The scope of information resulting from the law on the processing of

	ePUAP – inbox: KGSG/PNR		passenger name record.
Service Desk (24/7)	servicedesk@strazgraniczna.pl	+48 797 337 000 +48 91 434 6029	Technical problems related to data transfer, carrier system failure, loss of connection with KSI PNR.
Technical support	support.ksi.pnr@strazgraniczna.pl		Configuration details of the KSI PNR system. Network addresses for individual data transmission protocols.

Annex 1 - Contact details of the air carrier

CONTACT DETAILS OF THE AIR CARRIER	
Air Carrier's name and IATA / ICAO code:	
Name & address of the air carrier's representative / proxy in Poland*:	
Address:	
E-mail contact:	
Telephone:	
Business contact	
Personal data	
Title	
E-mail	
Telephone	
Contact for technical support**	
Personal data	
Title	

E-mail	
Telephone	
24/7 technical support contact**	
Personal data	
Title	
E-mail	
Telephone	
Service provider contact**	
Personal data	
Title	
E-mail	
Telephone	

* Representative / proxy authorized to receive correspondence

**Optional fields – recommended in order to improve cooperation

Annex 2 - Supported data formats and transmission protocols

Requirements	Available options
Transmission protocol	IATA Type-B IBM MQ AS4
Data format	PNRGOV: - EDIFACT (ver. 11.1 and later), - XML (ver. 13.1 and later) API: - EDIFACT PAXLST (2003 and later)
Flights direction*	Arriving and departing from Poland
Type of flights*	All available types code share, multi leg flight, circular flight, wet/dry lease, charter
The territorial range*	non-EU and intra-EU (with the exception of domestic flights)
The deadline for submitting data*	Message No. 1: between 48h and 24h before the aircraft starts Message No. 2: ATD (actual time of departure)
Contents of the message PNRGOV*	always full information (Full PNR)
Historical information in the message*	YES
Support for API data in the message PNRGOV*	YES
API sent by a separate channel*	YES
Compression support*	YES

* Optional fields - recommended in order to improve cooperation

Support for multi-part messages*	YES
Testing environment*	YES

Annex 3 – Scope of collected PNR data

Information on the scope of collected passenger data (PNR) by the air carrier		
Name of the carrier	Data that the carrier collects for each PNR flight*	
	(A) always	(B) not always
1. PNR record locator	<input type="checkbox"/>	<input type="checkbox"/>
2. Date of reservation/issue of ticket	<input type="checkbox"/>	<input type="checkbox"/>
3. Date(s) of intended travel	<input type="checkbox"/>	<input type="checkbox"/>
4. Name(s)	<input type="checkbox"/>	<input type="checkbox"/>
5. Address and contact information (telephone number, e-mail address)	<input type="checkbox"/>	<input type="checkbox"/>
6. All forms of payment information, including: billing address, payment card number, cash payment information, information on the invoice or other proof of payment for the ticket and information contained in the transfer order: bank account numbers of the sender and recipient, name and surname or name of the sender and recipient, amount and currency of the transfer, date and time of the transfer and its title	<input type="checkbox"/>	<input type="checkbox"/>
7. Complete travel itinerary for specific PNR	<input type="checkbox"/>	<input type="checkbox"/>
8. Frequent flyer information	<input type="checkbox"/>	<input type="checkbox"/>
9. Travel agency / travel agent	<input type="checkbox"/>	<input type="checkbox"/>
10. Travel status of passenger:		
a) including confirmations,	<input type="checkbox"/>	<input type="checkbox"/>
b) check-in status,	<input type="checkbox"/>	<input type="checkbox"/>
c) no-show or go-show information.	<input type="checkbox"/>	<input type="checkbox"/>
11. Split / divided PNR information incl.:		
a) change of booking made for more than one person in the scope of indicating a new direction of flight for at least one of them or	<input type="checkbox"/>	<input type="checkbox"/>
b) dividing PNR data, i.e. change of booking made for more than one person in the field of indicating a new direction of flight for all persons covered by it	<input type="checkbox"/>	<input type="checkbox"/>
12. General remarks including all available information on unaccompanied minors under 18 years, such as:		
a) name and surname(s), gender of the minor, age, language(s) spoken	<input type="checkbox"/>	<input type="checkbox"/>
b) name and surname(s) of the minor's guardian at the time of take-off of the aircraft, his/her address, telephone number, e-mail address, type and number an identity document and relationship to the minor,	<input type="checkbox"/>	<input type="checkbox"/>
c) name and surname(s) of the minor's guardian at the time of landing of the aircraft, his/her address, telephone number, e-mail address, type and number of the identity document and the relationship to the minor,	<input type="checkbox"/>	<input type="checkbox"/>
d) name and surname(s) of the air carrier's representative present at the departure and arrival	<input type="checkbox"/>	<input type="checkbox"/>
13. Ticketing field information, including ticket number, date of ticket issuance and one-way tickets, automated ticket fare quote fields	<input type="checkbox"/>	<input type="checkbox"/>
14. Seat number and other seat information	<input type="checkbox"/>	<input type="checkbox"/>
15. Code share information	<input type="checkbox"/>	<input type="checkbox"/>
16. All baggage information	<input type="checkbox"/>	<input type="checkbox"/>
17. The number and names of other passengers mentioned in the PNR data regarding the booking	<input type="checkbox"/>	<input type="checkbox"/>
18. Any advance passenger information (API) data collected, including:		

	a) the type, number, country of issuance and expiry date of any identity document	<input type="checkbox"/>	<input type="checkbox"/>
	b) nationality	<input type="checkbox"/>	<input type="checkbox"/>
	c) family name, given name	<input type="checkbox"/>	<input type="checkbox"/>
	d) gender	<input type="checkbox"/>	<input type="checkbox"/>
	e) date of birth	<input type="checkbox"/>	<input type="checkbox"/>
	f) name of the carrier, flight number, departure date, arrival date, departure time and arrival time	<input type="checkbox"/>	<input type="checkbox"/>
	g) departure port, arrival port	<input type="checkbox"/>	<input type="checkbox"/>
	19. All historical changes to the PNR listed in numbers 1 to 18	<input type="checkbox"/>	<input type="checkbox"/>

* Please mark with x or ✓ in the selected column in case when data is obligatorily (always) collected for every flight (column A) or optionally collected (column B) by the air carrier. In case of not collecting certain data please leave the box unchecked.

Annex 4 – Data required when reporting the impossibility to transfer PNR data

Reporting the impossibility of transferring PNR data		
The name of the air carrier		
The number (numbers) of flights to which the notification relates		
PNR messages to which the application relates*		
The date and time when the PNR data cannot be transferred		
Expected period of inability to transfer PNR data		
The reason for the impossibility to transfer PNR data		
Will the PNR data be forwarded to PIU	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	when:	reason:
A proposal for a different way of transmitting the PNR data in question		

*Specifying the date or dates in which the PNR data were to be provided on a scheduled basis