

To Whom It May Concern:

On behalf of a coalition of U.S.-based organizations that host major international trade shows, exhibitions, and business conferences, we appreciate the opportunity to submit comments on U.S. Customs and Border Protection's (CBP) proposed revisions to the Arrival and Departure Record (Form I-94) and the Electronic System for Travel Authorization (ESTA), OMB Control Number 1651-0111.

Our associations represent industries that generate substantial economic activity through international business travel and global commerce. The trade shows and conferences we host serve as key platforms for U.S. exports, connecting American manufacturers, technology companies, and service providers with international buyers and consumers. These events support hundreds of thousands of jobs across the United States and contribute meaningfully to national economic prosperity and competitiveness.

We are deeply concerned that the proposed expansion of data collection requirements on the ESTA application, particularly social media information covering the previous five years, will have unintended and far-reaching consequences for inbound travel and international business engagement. These changes have already generated significant confusion and alarm among international travelers, foreign media, and Visa Waiver Program (VWP) partner governments, and are creating uncertainty for our future trade shows and business engagements.

A recent survey of international travelers from VWP countries conducted by the World Travel & Tourism Council (WTTC) [revealed](#) that two-thirds of the over 4,500 travelers surveyed said they were aware of the proposed policy already, with a large share saying it would make the U.S. feel less welcoming and less attractive for both leisure and business travel. Further, over one-third of those surveyed revealed that they would be somewhat or much less likely to visit the U.S. due to the new proposal. The potential decline in travelers—over a 23% reduction from VWP countries—could cost the U.S. an estimated \$15.7 billion in lost visitor spending and over 150,000 lost jobs. This would be devastating to not just the travel economy, but to states and communities across the country.

The chilling effect of this proposal on inbound travel from VWP countries cannot be overstated. We are already hearing from international exhibitors, attendees, and corporate decisionmakers who are reconsidering participation in U.S.-based events due to uncertainty surrounding the proposal. For international travelers—particularly business travelers—requests to provide extensive social media information, and even highly sensitive data such as DNA, are deeply concerning. Faced with these requirements, many travelers may opt to conduct business in alternative markets rather than attend U.S.-based trade shows and meetings. This outcome would directly harm the U.S. trade balance and severely diminish attendance, deal-making, and economic output associated with U.S. trade shows and conferences. The negative spillover effects would extend well beyond the travel sector to U.S. exporters, manufacturers, technology firms, and small businesses nationwide.

We appreciate CBP's mission to protect national security while facilitating lawful travel and trade. Policies that increase barriers to entry or create uncertainty for travelers risk deterring lawful visitation and weakening the United States' competitive position as a global hub for business and commerce. The VWP, which is intentionally different from a cumbersome visa process, has long balanced security, economic growth, and strong international partnerships. Preserving that balance is critical to maintaining U.S. leadership in global trade, travel, and innovation. We appreciate the opportunity to provide these comments and encourage CBP to withdraw its proposal.

Sincerely,

American College of Cardiology (ACC)
American College of Rheumatology (ACR)
American Composites Manufacturers Association (ACMA)
Association of Equipment Manufacturers (AEM)
American Industrial Hygiene Association (AIHA)
American Society of Association Executives (ASAE)
Building Service Contractors Association International (BSCAI)
Consumer Technology Association
Financial & Insurance Conference Professionals (FICP)
Heart Rhythm Society (HRS)
International Sign Association (ISA)
North American Association of Food Equipment Manufacturers (The NAFEM Show)
North American Wholesale Lumber Association (NAWLA)
PMMI, the Association for Packaging and Processing Technologies (PACK EXPO)
Professional Convention Management Association (PCMA)
Radiological Society of North America (RSNA)
Recycled Materials Association (ReMA)
RIMS, the Risk and Insurance Management Society
Selected Independent Funeral Homes
Society of Gastroenterology Nurses and Associates (SGNA)
Society for Laboratory Automation and Screening (SLAS)
World Federation of Building Service Contractors (WFBSC)