



Comment on Proposed Rule: Expansion of ESTA Data Collection Requirements

Submitted by: International Inbound Travel Association

OMB Control Number 1651-0111 - Department of Homeland Security

Introduction

The International Inbound Travel Association (IITA) appreciates the opportunity to comment on the proposed rule that would significantly expand mandatory data collection requirements for applicants using the **Electronic System for Travel Authorization (ESTA)**, administered by **U.S. Customs and Border Protection (CBP)** within the **Department of Homeland Security (DHS)**.

IITA represents the U.S. inbound travel industry — inbound tour operators and their destination and supplier partners — that bring millions of international visitors to the United States each year. Our members are on the front lines of international travel demand and see firsthand how entry policies affect traveler confidence, destination choice, and the competitiveness of the United States as a global destination.

Support for Security, Concern with the Scope of the Proposal

IITA strongly supports effective, intelligence-driven security measures that protect Americans and visitors alike. The inbound travel industry depends on safe and secure travel systems, and we recognize the importance of robust screening.

However, IITA is concerned that the **scope and cumulative nature of the proposed data collection requirements — including extensive personal history, familial contact information, and mandatory social media identifiers — is excessive, insufficiently justified, and likely to deter lawful, low-risk travelers** from Visa Waiver Program (VWP) countries.

Why the Expanded Data Collection Is Problematic

1. Excessive and Intrusive Personal Data Requirements

Beyond social media identifiers, the proposed rule would require ESTA applicants to submit **years of personal contact history**, including:

- Multiple phone numbers and email addresses
- Detailed familial contact information

- Extended historical residence and communication data

For travelers from trusted VWP countries — many of which have longstanding security partnerships with the United States — this level of personal and familial data collection is **disproportionate to the risk profile** of the traveler population and raises legitimate concerns about privacy, data use, and over-collection.

From the traveler's perspective, the issue is not one field, but the **aggregate burden and intrusiveness** of the application. Each additional requirement compounds uncertainty and discomfort, particularly for travelers unfamiliar with U.S. screening norms.

2. Social Media Disclosure Amplifies Privacy and Perception Concerns

Making social media identifiers mandatory further heightens these concerns. Even if content is not routinely reviewed, many travelers perceive this requirement as invasive and opaque. The proposal does not clearly explain:

- How social media data would be evaluated
- What criteria would trigger additional scrutiny
- How errors, misidentification, or false positives would be resolved

For international travelers, the lack of transparency around how personal expression or online presence might be interpreted creates anxiety and erodes trust in the process.

3. Documented Chilling Effect on Travel Demand

These concerns are not theoretical. A recent survey of international travelers from VWP countries conducted by the **World Travel & Tourism Council (WTTC)** found:

- **Two-thirds of the more than 4,500 travelers surveyed were already aware of the proposed policy.**
- A large share said it would make the United States feel **less welcoming and less attractive** for both leisure and business travel.
- **More than one-third stated they would be somewhat or much less likely to visit the U.S.** if the proposal is implemented.

WTTC estimates the resulting decline — **over a 23% reduction in visitation from VWP countries** — could cost the United States **\$15.7 billion in lost visitor spending and more than 150,000 lost jobs.**

These findings underscore that perception, privacy concerns, and policy friction at the pre-travel stage have real and measurable economic consequences.

4. Cumulative Impact on U.S. Competitiveness

This proposal must be viewed in the context of **multiple recent policy changes** that increase cost, complexity, and uncertainty for international travelers. While each measure may appear manageable in isolation, together they are contributing to a narrative that travel to the United States is increasingly burdensome.

For VWP travelers — who have numerous alternative destinations — these cumulative deterrents matter. The result is not enhanced security, but **lost visitation, lost revenue, and lost jobs**, particularly in gateway communities and destinations reliant on international travel.

Recommendation

IITA urges DHS and CBP to reconsider this proposal in its current form and to work collaboratively with industry stakeholders to avoid unintended harm to inbound travel and the U.S. economy.

Conclusion

Visa Waiver Program travelers are among the United States' most trusted visitors. They support American businesses, generate billions in spending, and sustain hundreds of thousands of jobs. Policies governing their entry should be **risk-based, proportionate, and transparent**, ensuring security while preserving the United States' reputation as a welcoming destination.

We stand ready to work with DHS and CBP to help identify approaches that meet security objectives while minimizing unnecessary friction for lawful, low-risk travelers and protecting the vitality of U.S. inbound travel.

Respectfully submitted,

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