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February 9, 2026

Seth Renkema
Chief, Economic Impact Analysis Branch
U.S. Customs and Border Protection
Office of Trade, Regulation and Rulings
90 K Street NE, 10th Floor
Washington DC 20229

Re: Agency Information Collection Activities; Revision; Arrival and Departure Record (Form I-94) and Electronic System for Travel Authorization (ESTA); OMB Control No. 1651-0111 (FR Doc. 2025-22461)

Dear Mr. Renkema:

The Consumer Technology Association (CTA)® - owner and producer of CES® - appreciates the opportunity to comment on the U.S. Department of Homeland Security (DHS) and U.S. Customs and Border Protection (CBP) proposed revisions to information collections for the Arrival and Departure Record (Form I-94) and Electronic System for Travel Authorization (ESTA).

CES is the world's largest and most influential technology event, taking place each January in Las Vegas, serving as a critical platform for American innovators, global companies, startups, researchers, and media to connect, showcase breakthroughs, and generate billions in economic activity. Each year, CES brings the world to the United States, and the ability of international attendees to travel efficiently and predictably is foundational to the event's success and the nation's technology leadership.

Recent CES metrics illustrate the indispensable role of international participation. CES 2026 drew more than 148,000 attendees, including 55,000 from abroad, and featured over 4,100 global exhibitors across every major technology sector. International media participation was similarly strong, with over 6,900 reporters, creators, and analysts – 37 percent of whom were international – helping to project U.S. technology and innovation leadership worldwide. These figures reflect the central importance of foreign visitors in driving deal-making, investment, product launches, and supply-chain activity in the United States. We estimate that the economic impact of CES 2025 alone was estimated at \$381.2 million.

The proposed expansion of data-collection requirements under ESTA, particularly multi-year social-media disclosure, is already creating confusion and concern among international exhibitors, buyers, and media, and has the potential to deter lawful, low-risk travelers on a large

scale. Global companies and attendees are reconsidering participation in U.S. events due to the uncertainty and sensitivity surrounding these proposed requirements.

Research from the World Travel & Tourism Council (WTTC) indicates the proposed policy could reduce international arrivals from ESTA-eligible markets by up to 23.7 percent, resulting in \$15.7 billion in lost visitor spending and putting an estimated 157,000 American jobs at risk.¹ These outcomes would have direct and harmful consequences for CES and for America's broader technology economy, which depends on global collaboration and in-person engagement.

Further, travelers entering under the Visa Waiver Program (VWP) constitute a proven low-risk population, as demonstrated by DHS's FY 2024 Entry/Exit Overstay Report, which found VWP air and seaport travelers had an overstay rate of just 0.43%. Despite this strong record of compliance, the proposed rule introduces substantial privacy, operational, and procedural uncertainties.

CTA also has concerns regarding the proposed information-collection revisions' undefined data-submission requirements, unclear retention and sharing policies, a lack of safeguards for sensitive information, the absence of a phased or pilot implementation plan, and the risk of reciprocal measures by allied nations. These unresolved issues would increase friction for travelers and place additional burdens on U.S. agencies, carriers, event organizers, and businesses at a time when the United States should be strengthening – not undermining – its reputation as a welcoming destination for global innovation. The breadth of the proposed data-submission requirements also create the risk of inadvertent inconsistencies and omissions, which could negatively impact the ESTA approval process and delay or prevent legitimate travel.

For these reasons, CTA respectfully urges DHS to withdraw or pause the proposed information-collection revisions to allow for further consultation with stakeholders across the technology, travel, and events sectors. Any future changes should be narrowly tailored, risk-based, and supported by transparent privacy protections, clear technical standards, and a phased implementation strategy that minimizes disruptions. Preserving the efficiency and reliability of ESTA is vital to maintaining the United States' leadership in global technology, innovation, and commerce.

CTA and our member companies stand ready to collaborate with DHS and CBP to ensure that border-security objectives can be achieved without undermining economic growth, international cooperation, or America's status as the premier destination for global technology engagement.

¹ World Travel & Tourism Council, "Planned U.S. Border Social Media Changes Could Reduce Visitor Spend by USD \$15.7 Billion and Impact 157,000 American Jobs, According to New WTTC Research," accessed February 9, 2026, <https://wttc.org/news/planned-u-s-border-social-media-changes-could-reduce-visitor-spend>.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Brzytwa".

Ed Brzytwa
Vice President, International Trade
Consumer Technology Association (CTA)®

A handwritten signature in black ink, appearing to read "Michael Petricone".

Michael Petricone
Senior Vice President, Government Affairs
Consumer Technology Association (CTA)®