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Continuing to collect the attestation form OMB 0920-1318 {"Attestation"}) is a waste of CDC and government resources and should be ended immediately. The Attestation is no longer necessary to prevent the transmission of COVID-19 into the United States, is a meritless collection of irrelevant data, is preventing the U.S. tourism economy from recovering, and violates U.S. law.

By the CDC's own information, collecting the Attestation is no longer necessary to prevent COVID-19. By Presidential Proclamation 10294, the purpose of banning unvaccinated nonimmigrant noncitizens was to prevent the transmission of COVID-19 into the United States. It is now well known that COVID is not vaccine-preventable. CDC Director Walensky told the public on April 6, 2022, that "there is no longer a serious danger that the entry of covered noncitizens... into the United States will result in the introduction, transmission, and spread of COVID-19 and that a suspension of the introduction of covered noncitizens is no longer required in the interest of public health." Although this is in regards to Title 42, expulsion of migrants at the border, how can that also not be true for nonimmigrants whose stay in the United States is transitory, lawful, and other less-restrictive means such as testing exist to better prevent the transmission of the disease into the United States than a vaccine where "breakthrough infections occur."

Indeed, the CDC's own guidance is to "no longer differentiate based on a person's vaccination status because breakthrough infections occur." If the CDC has not been distinguishing by vaccination status since August 19, 2022, then why has it been continuing to waste man hours and taxpayer dollars collecting information on international travelers' vaccination status? It no longer matters whether a person is vaccinated towards the goal of preventing COVID-19 transmission, and therefore, the vaccination status data is no longer relevant to collect towards that purpose.

Not only is it a wholly fruitless squandering of agencies resources, continuing to use the Attestation as a way to enforce Proclamation 10294 and the Amended Order Implementing said Proclamation is costing U.S. citizens and economy more than just the dollars and hours it takes to collect and maintain such records. Prior to 2020, the U.S. received more than \$230 billion in revenue from the tourism industry in 2018, and again in 2019. In 2020, the revenue was cut to \$84 billion. In 2021, when travel resumed, the amount of revenue actually reduced to \$80.1 billion. Even in 2022 after a year of resumed travel for vaccinated foreigners, the U.S. only saw approximately \$147 billion in revenue. That's still \$100 billion less than prior to COVID. Continuing to ban unvaccinated travelers (combined with long visa wait times in certain countries) is costing the U.S. more than it is worth spending on collecting the Attestation.

The Proclamation, Amended Order, and Attestation exist in violation of U.S. law. Title 8 entry denial for health reasons relating to vaccines is only for failing to provide proof of "vaccine-preventable diseases." There is no entry requirement in Title 8 requiring noncitizens show proof of vaccination against any diseases, only "vaccine-preventable diseases." As the agency is aware, the vaccine does not prevent COVID. Thus, continuing to require the Attestation to receiving the vaccine violates Title 8. It is not for the Agency to create law. See 573 U.S. 302 (2014).