

U.S. TRAVEL ASSOCIATION

The U.S. Travel Association submits the following comments in support of the Administration's efforts to improve the international entry process at our nation's air ports of entry. These comments are submitted in response to the August 18 Federal Register Notice inviting stakeholder comments on the proposed continuing information collection of biometric information.

The U.S. Travel Association is the national, non-profit organization representing all components of the travel industry that generates \$2.1 trillion in economic output and supports 15 million jobs. U.S. Travel's mission is to increase travel to and within the United States. U.S. Travel's membership is comprised of 1,300 organizations, which include the Gateway Airports Council comprised of 15 of the largest U.S. gateway airports around the country, major hotels, theme parks, online travel companies and casinos. The association also represents over 400 city convention and visitors' bureaus and every state tourism office in the United States.

Economic Importance of International Travel

In 2014, nearly 75 million international travelers visited the United States. Total travel exports reached \$220.6 billion in 2014 (including international travelers' spending on travel in the U.S., international air passenger fares, spending on education and health, as well as spending by border, seasonal, and other short-term workers in the United States). In 2014, one in 11 (9.4%) of U.S. goods and services exports was generated by international travelers. Last year, travel exports grew 2.5 percent over 2013, yielding \$75 billion travel trade surplus. Without travel's trade surplus, the U.S. trade deficit would have been 15 percent larger. Of total travel exports in 2014, \$137 billion was spent on travel in the U.S. which directly supported 1.1 million American jobs.

The most lucrative segment of this international travel is "long-haul" or overseas travel to the United States. In 2014, 34 million overseas travelers visited the United States, spending \$144 billion on travel in the U.S. and international passenger fares, nearly all arriving through major international airports. The overseas traveler stays longer and spends more while here – an average of 18 nights and nearly \$4,400 per visitor per trip. Millions of global citizens are now traveling abroad and for every 35 overseas travelers who decide to visit the U.S. an additional American job is created.

The potential for further growth is enormous. In 2000, the U.S. had a 17 percent share of the worldwide long-haul international travel market. In 2014, even as we competed more effectively in the booming global travel market, our share dropped to just 13.2 percent, as the total number of global travelers rose sharply. If the U.S. could regain 17 percent of global long-haul market share by 2020, it would receive an additional 44.3 million overseas arrivals cumulatively from 2015 to 2020, \$425 billion in total economic output, and 525,000 more jobs than total jobs directly and indirectly supported by overseas travelers currently.

Understanding the important role of travel in our nation's economic recovery efforts, the President released the first ever National Travel and Tourism Strategy in 2012. At the crux of

the strategy was an aggressive goal of welcoming 100 million international visitors to the U.S. annually by 2021. At the time of the announcement the U.S. had welcomed 62.3 million international visitors in 2011. To date, we are proud of the progress made toward the President's national goal and believe that our ongoing efforts, combined with the Administration's continued focus, will result in 100 million visitors.

Reaching this goal however will mean that our major international airports will need to welcome 200,000 additional flights each year. According to U.S. Travel projections based on Bureau of Transportation Statistics, by 2021 major U.S. airports must be prepared to handle millions of additional visitors including 13.8 million more at New York's John F. Kennedy International Airport; 10.5 million more at Miami International Airport; and 9.6 million more at Los Angeles International Airport.

Unfortunately, the entry system at U.S. gateway airports is already stressed. In 2013, U.S. Travel issued a report titled, Gateway to Jobs and Growth: Creating a Better Traveler Entry Process, which highlighted the long delays travelers face when they are processed by U.S. Customs and Border Protection (CBP) at air ports of entry. In April 2013 for example, the peak wait time at Miami International Airport was 4 hours, 41 minutes and the peak wait time at Washington Dulles was 2 hours, 52 minutes. While these times have been significantly reduced over the last couple of years, it's critical that we continue to make reforms that will meet the continued growth in visitation.

We applaud CBP for its willingness to implement creative solutions to improve the overall entry and exit experience for international visitors and returning U.S. citizens. We know the agency carries out its duties with skill and professionalism. The President's May 22nd Executive Memo to establish a national goal and develop airport-specific action plans to enhance the entry and exit process for international travelers will help to ensure that CBP receives the resources and support to meet the growing influx of travelers. The travel community is eager to partner with CBP in meeting this challenge.

National Goal to Enhance the Entry Process for International Travelers

The Administration, airports and stakeholders from the travel industry have a shared national objective to facilitate the existing and future travel demand of arriving international travelers to the United States while minimizing total passenger processing time, ensuring appropriate levels of security and creating a welcoming customer experience.

In order to reach this aspirational outcome, our joint efforts should be built upon a comprehensive end-to-end evaluation of existing practices, local and national action plans and metrics, with results measured by service levels as well as traveler satisfaction. One key measure of success in achieving this national goal entails revolutionizing the international arrivals process to ensure a maximum primary processing time during regular operations of 30 minutes and a complete processing time of 45-60 minutes for 100 percent of all passengers through egress from the baggage claim area by 2017. Since we know that excessive processing times discourage travel to the United States, this transformation of our arrivals process is critical to facilitating travel and ensuring that our system can accommodate future travel demand and meet the President's national goal of 100 million international visitors by 2021. This goal must be accomplished without compromising security while creating a welcoming customer experience. Measurements and achievements in improving processing at U.S. international air ports of entry should be expanded or adapted for preclearance facilities as well.

We firmly believe that the adoption of this wait time goal for CBP operations will significantly benefit the traveling public and encourage more international visitation to the U.S., ultimately allowing our nation to reap the economic benefits outlined in the National Travel and Tourism Strategy. Although we understand the need for additional CBP resources, we firmly believe the adoption of such a goal would establish a key benchmark that would spur additional government and private sector coordination.

From CBP's perspective, the goal would provide CBP with the opportunity to reevaluate strategies when operations fall short at particular ports, provide valuable feedback on staffing levels and operational efficiency, and most importantly, justify the need for additional funding for resources to meet the goal in the current environment and as passenger volume increases in future years.

As for the private sector, this goal would provide greater insight on airport infrastructure and entry initiative investments and help ensure limited funds spent effectively and efficiently. At a time when private sector entities are being asked to contribute additional resources, our proposed goal would ensure that these significant investments are measurable and result in specific service level improvements for our customers. Airports need to know that if they make their own investments in facilities, technology or capacity-building, the federal government will strive to match those investments with additional resources, technology, and strategies to ensure that new passengers and limited resources does not generate unacceptable wait times. Thus, the goal would incentivize additional private sector investment and collaboration, further enhancing U.S. travel promotion efforts abroad.

As for the airport-specific goals called for in the Presidential Memorandum for at least the 15 busiest gateway airports, we believe it is critical to develop CBP entry goals at each location that contribute to meeting the national goal. Such plans should be developed by stakeholders at each location to meet both the 30 minute primary processing goal and the 45-60 minute overall goal. Each airport plan should have benchmarks for specific programs and measures of analysis including APC and MPC installation and expansion, bag delivery times, and use of programs like One Stop and Express Connect, tailored to the needs and infrastructure of each airport.

National Goal to Enhance the Exit Process for International Travelers

The travel community has consistently supported the development of an exit tracking system that would reliably confirm the departure of international visitors as they leave the United States. Improved exit tracking would help to verify the departure of international visitors. We recognize that the 9/11 Commission included a biometric entry-exit tracking system as a key recommendation; we support implementation *provided* it can be achieved in an appropriate, effective manner that does not disrupt or cause delays in the U.S. transportation system, and is fully funded by the federal government.

Current law requires the Department of Homeland Security to implement a biometric exit tracking system – which would gather and evaluate personally identifiable physical characteristics such as fingerprints or iris scans – but technical and logistical challenges, along with inadequate funding, have postponed implementation.

U.S. Travel supports an effective exit tracking system, but we remain concerned about the practical realities of deploying a biometric exit system in the near term. Implementing such a

system will require careful consideration of different alternatives, appropriate piloting at targeted locations to limit disturbances on the transportation system, and deployment only when it can be done without interfering with the legitimate travel that benefits our economy. No one wants a repeat of the experience of high-tech body scanners that were installed in airports around the country – at great expense – and later withdrawn because the technology wasn't ready for the day-to-day realities of mass passenger screening.

A 2008 Department of Homeland Security study estimated the 10-year cost of implementing a biometric exit tracking system at between \$3.1 and \$6.4 billion, but that estimate did not include costs borne by other parties, such as airports that would be required to fund substantial facility modifications, or the economic costs of potential disruptions to the orderly flow of passengers through aviation security screening checkpoints.

It's important to understand, too, that the Department of Homeland Security says that the current, non-biometric exit tracking system has improved significantly in the last few years. U.S. authorities have made strides in collecting biographic data – basic passport information such as name, date of birth and country of origin – from departing international visitors and matching those against entry records to identify visitors who have overstayed their visa. It would be beneficial for DHS to fulfill its Congressional mandate to provide the visa overstay report, which is currently overdue. The overstay data is important for determining the need for additional tracking and overstay enforcement, and to allow Visa Waiver Program (VWP) expansion measures, such as S. 2091/H.R. 1401 to move forward in Congress. .

Given the progress on strengthening exit tracking using biographical information and the cost of deploying a new system, we urge Congress and the Administration to carefully consider both the scale of the investment required and the technical and logistical hurdles that must be crossed to effectively implement biometric exit tracking at leading U.S. gateway airports. As Administration officials have recognized, America's gateway airports “do not have designated and assured exit areas for outgoing passengers to wait prior to departure, nor do they have specific checkpoints through which outgoing passengers' departure is recorded by an immigration officer.”

America's travel community is concerned that moving forward too quickly with biometric exit tracking without addressing the underlying barriers to implementation could be counterproductive.

As many law enforcement experts have noted, merely identifying individuals who may not be departing the United States in compliance with the terms of their entry is not the complete solution. Ensuring immigration integrity also will require enforcement at the workplace and in other settings to diminish the ability of individuals to abuse the U.S. immigration system.

U.S. Travel has developed three principles that we believe must be adhered to in developing and deploying a biometric exit tracking system:

- An air exit tracking system must be convenient and easily understood by the passenger and flexible enough to fit into the unique workflow of each airport.
- Deployment of any new exit tracking system requires a well-funded outreach campaign to ensure that passengers understand how the program works, what law enforcement protocols are in place and how the government will ensure adequate compliance without delaying flights or inconveniencing travelers.

- Exit tracking is a government responsibility, and deployment costs borne by third parties must be compensated. America's travel community will strenuously oppose new unfunded mandates or added burdens imposed on the traveling public.

Technology limitations and the lack of dedicated infrastructure at U.S. airports make it difficult to collect biometric data from departing air passengers without imposing significant disruptions on passengers and airlines. U.S Travel supports the creation of the DHS Science & Technology and CBP Maryland Test Facility (MdTF), which is a next logical step in developing and testing enhanced entry and exit processes at U.S. airports. Implementing such a system will require careful consideration of different alternatives, appropriate testing, pilot programs at targeted locations to limit disturbances on the transportation system, and deployment only when it can be done without interfering with the legitimate travel that benefits the U.S. economy.

The need for this Presidential travel initiative underscores that CBP's existing staffing levels and general resources are strained to achieve its mission on the international arrivals process. Efforts to deploy a biometric exit system at the nation's major airports, including utilization of CBP staff for the program, should only be implemented after the proposed national goal is fully satisfied.

America's travel community believes that our country is capable of being the world's top destination for travel and tourism and having a credible immigration enforcement system. We want to welcome visitors to our shores to visit, conduct business, study and connect with Americans, but we also want them to comply with our immigration laws that place limits of the duration of their visit and their ability to work or collect benefits in the United States.

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