Before the
U.S. Customs and Border Protection
U.S. Department of Homeland Security
1300 Pennsylvania Avenue, NW
Washington, DC 20229

In the Matter of	)	
Proposed Information Collection:	)	Docket No.: OMB Control Number 1651-0111
Electronic System for Travel Authorization (ESTA) and Form I-94 Automation	))	90 FR 57208 (December 10, 2025)

COMMENTS OF THE

ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS

The Alliance for Telecommunications Industry Solutions (ATIS) respectfully submits these comments in response to U.S. Customs and Border Protection's (CBP) proposed modifications to the information collection requirements for the Electronic System for Travel Authorization (ESTA) and Form I-94 automation programs.

I. OVERVIEW

A. Description of Notice

CBP proposes substantial expansions to information collection requirements under the ESTA and I-94 programs, including: (1) mandatory disclosure of social media identifiers and platforms used during the last five years for all applicants; (2) collection of family member information including names, dates of birth, places of birth, current residences, and telephone numbers; (3) telephone numbers (personal and business) for the last five years and email addresses (personal and business) for the last ten years; (4) biometric data including facial images with liveness detection, and for some applicants, fingerprints, DNA samples, and iris scans; (5) IP addresses and metadata from submitted photographs; and (6) transition to a mandatory mobile-only application platform with decommissioning of the current ESTA website. These changes are proposed pursuant to Executive Order 14161 (January 2025) and are intended to address fraud prevention and national security concerns.

B. Purpose and Summary of Comments

ATIS submits these comments to provide CBP with specific information about how the proposed information collection would impose a burden that goes far beyond its immediate paperwork and

reporting costs, undermining the very ability for organizations such as ATIS to host successful international standards development meetings in the United States. As such, ATIS recommends modifications that would address CBP's legitimate security and fraud prevention objectives while minimizing burden on the low-risk business travelers that the Visa Waiver Program (VWP) was designed to encourage. ATIS recognizes that CBP faces genuine challenges with fraudulent ESTA applications, poor-quality passport uploads, and the need to enhance identity verification. The liveness detection features and near-field communication (NFC) passport scanning capabilities proposed in the Federal Register notice represent reasonable technological improvements to address these concerns.

ATIS is concerned that several elements of the proposed information collection are not well-tailored to the risk profiles of verified business travelers attending standards meetings, will impose burdens that significantly exceed CBP's estimates, and will have substantial adverse impacts on U.S. economic competitiveness in technology standards development.

ATIS recommends: (1) modifications to limit social media information collection to professional networking platforms and shorter timeframes; (2) elimination of family member data requirements for short-term business visitors; (3) maintenance of a website application option for accessibility and corporate travel coordination; (4) exclusion of biometric data beyond facial recognition for low-risk travelers; and (5) creation of a streamlined process for granting visas for non-VWP participants for standards organization meetings similar to existing expedited entry programs. These modifications would address CBP's security concerns while preserving the United States' ability to host international standards meetings essential to U.S. technology leadership.

II. BACKGROUND

A. About ATIS

The Alliance for Telecommunications Industry Solutions is a leading U.S.-based standards development organization (SDO) that has played a critical role in developing technical, operational, and strategic standards for the ICT industry for over four decades. ATIS operates as an American National Standards Institute (ANSI)-accredited organization, developing voluntary consensus standards through open, balanced, and transparent processes that have proven essential to technological innovation, U.S. economic leadership, and the interoperability of communications systems.

ATIS serves as the North American Organizational Partner for 3GPP, a global partnership project that unites seven regional SDOs from around the world to produce technical specifications for mobile telecommunications systems. Through 3GPP, technical specifications for 3G, 4G LTE, and 5G wireless technologies have been developed and are now being deployed worldwide. Work is currently underway on 5G Advanced specifications and research for 6G systems expected to be deployed in the 2030s. The technical specifications developed in 3GPP are transposed by the Organizational Partners, including ATIS, into national standards in each Partner's respective region.

ATIS membership includes wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety and other governmental agencies, and internet service providers. Nearly 600 industry subject matter experts work collaboratively in ATIS committees and working groups to develop robust standards that support the evolving needs of the ICT landscape. The organization's efforts are vital in maintaining the technological advancement and interoperability of communications systems on a global scale, ultimately benefiting consumers, industry stakeholders, and public safety entities alike.

As part of its mission to facilitate international telecommunications standards development, ATIS regularly hosts global standards meetings in the United States. These meetings bring together technical experts from around the world to collaborate on the development of the technical specifications that form the foundation of modern communications networks. The ability to host such meetings in the United States is not merely a convenience but a strategic imperative for maintaining U.S. influence in the standards development process and ensuring that U.S. technological and policy priorities are adequately reflected in global standards.

B. The Importance of Standards and Standards Meetings to U.S. Technology Leadership

1. Standards Development and National Competitiveness

International standards play an indispensable role in enabling advanced technologies, such as 6G wireless communications, artificial intelligence, quantum computing, and other critical and emerging technologies. These standards establish the technical foundations upon which innovators build new products and services, define the interoperability requirements that allow diverse systems to work together, and create the common frameworks that enable global markets for technology-based products and services.

Achieving and maintaining standards influence requires robust international participation at U.S.-hosted meetings. The standards development process is inherently collaborative and consensus-based. Technical decisions are made through deliberation among experts who bring diverse perspectives and technical contributions. When the United States hosts standards meetings, U.S.-based companies and technical experts have enhanced opportunities to participate effectively, to build relationships with international colleagues, to shape technical agendas, and to ensure that U.S. technical approaches and policy priorities receive full consideration. This "home field advantage" translates directly into greater U.S. influence over the technical specifications that will govern the next generation of communications technologies and applications.

2. Role and Importance of Standards Meetings

Face-to-face meetings of subject matter experts remain essential to effective standards development despite advances in remote collaboration technologies. The highly technical nature of standards work requires intensive discussion, real-time problem-solving, and iterative refinement of technical proposals. Complex technical issues often cannot be fully resolved through written contributions or remote participation alone. The ability to work through technical challenges collaboratively, to build consensus through direct interaction, and to leverage the

collective expertise of participants in real-time discussions is crucial to producing high-quality technical standards in a reasonable timeframe.

Consensus-based decision-making in standards development requires physical presence for maximum effectiveness. While remote participation options are available for many standards meetings, they are not a complete substitute for in-person participation. Technical experts who participate remotely often have difficulty fully engaging in discussions, face challenges in building the relationships necessary for effective collaboration and may be disadvantaged in influencing technical decisions. Remote participation is particularly problematic across multiple time zones, as it may require participants to join meetings at inconvenient hours and limits their ability to participate in the full range of meeting activities.

3. 3GPP Meetings

The Third Generation Partnership Project represents one of the most successful examples of international standards collaboration in the ICT sector. Launched in 1998 to develop technical specifications for third generation (3G) mobile systems, 3GPP has evolved to become the primary forum for developing specifications for all generations of cellular wireless technology. The 3GPP partnership brings together seven regional Organizational Partners: ATIS from North America, the European Telecommunications Standards Institute (ETSI) from Europe, the Association of Radio Industries and Businesses (ARIB) and the Telecommunication Technology Committee (TTC) from Japan, the China Communications Standards Association (CCSA) from China, the Telecommunications Technology Association (TTA) from Korea, and the Telecommunications Standards Development Society of India (TSDSI) from India.

3GPP Working Group and Technical Specification Group (Plenary) meetings are typically held 10 times per year in different regions around the world, rotating among North America, Europe, China, Japan, India, and Korea. These meetings bring together hundreds of technical experts for intensive week-long sessions during which technical contributions are presented, discussed, and incorporated into technical specifications. A typical 3GPP meeting may involve 600 to 2,500 participants from dozens of countries, representing mobile network operators, equipment manufacturers, device vendors, software companies, and other stakeholders in the mobile communications ecosystem. The international composition of 3GPP meetings reflects the global nature of mobile communications and the necessity of developing technical specifications that work seamlessly across national boundaries.

The consensus-based nature of 3GPP work requires active participation from representatives of diverse stakeholder groups. Technical decisions are made through a process of contribution, discussion, revision, and agreement among participants. This process depends critically on the presence of technical experts who can explain and defend technical proposals, respond to questions and concerns from other participants, and work collaboratively to find solutions that address the needs of all stakeholders. When participation is impeded by travel difficulties or administrative barriers, the quality of technical deliberations suffers, and the legitimacy of resulting specifications may be questioned.

Meeting rotation among different global regions is a fundamental principle of 3GPP operations, designed to distribute the burden of international travel among participants from different regions and to ensure that no single region exercises disproportionate influence over the standards development process. However, the effectiveness of this rotation depends on each region being accessible to international participants. In recent years, the United States has become an increasingly difficult venue for hosting 3GPP meetings due to visa processing challenges and other entry barriers facing international participants.

4. Economic and Strategic Value

The ability to host standards meetings in the United States provides strategic and economic value to U.S. companies that extends far beyond the immediate benefits of reduced travel costs and time zone convenience. When meetings are held in the United States, U.S. companies can more easily send larger and more diverse delegations, including technical experts who might not be able to justify the time and expense of international travel. The increased participation enables U.S. companies to exert greater influence over technical decisions, to ensure that their technical contributions receive full consideration, and to build the relationships with international colleagues that facilitate ongoing collaboration. This is especially important for small and medium-sized businesses, universities, and non-profits who, due to resource constraints, often find it difficult to contribute or otherwise meaningfully participate in standards development activities. In January 2026, John A. Squires, Under Secretary of Commerce for Intellectual Property and the Director of the US Patent and Trademark Office (USPTO) said, "American leadership in standards development is essential to innovation, competitiveness, and national security," and announced the creation of a new program to provide meaningful incentives for participation by these groups.[1]

In a report from the National Security Agency (NSA) and the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA), "Enduring Security Framework Recommendations for Increasing U.S. Participation and Leadership in Standards Development," they noted that "ease of travel for accessing U.S.-hosted SDO meetings has been challenging in recent years." Their very first recommendation was to "Establish the United States as a Venue of Choice for Hosting Standards Meetings," specifically:

> "To support increased U.S. hosting of SDO meetings, the U.S. government should position standards development activities—and meetings in the U.S.—as critical to national and economic security. It should consider allocating appropriated and approved resources to support hosting meetings in the U.S. It is also essential for the U.S. government to establish and maintain a stable, predictable regulatory and policy environment that welcomes foreign participants in standards-related meetings."[2]

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[1] "USPTO to Launch SPARK Pilot Program to Strengthen U.S. Standard Development Leadership," "*Patent and Trademark Office,* January 12, 2026, https://www.uspto.gov/about-us/news-updates/uspto-launch-spark-pilot-program.

[2] "Enduring Security Framework Recommendations for Increasing U.S. Participation and Leadership in Standards Development," *Recommendations for Increasing U.S. Participation & Leadership in Standards Development,* DHS/CISA, June 2024, https://media.defense.gov/2024/Jul/30/2003514270/-1/-1/0/ESF_ISG_Paper.PDF.

The long-term competitiveness implications of standards outcomes cannot be overstated. Technical standards define the architecture of communications networks, specify the interfaces between network elements, establish the protocols for communication between devices and networks, and determine the features and capabilities available to end users. Companies whose technologies are incorporated into standards benefit from large-scale deployment of those technologies and from the competitive advantages that come from early and deep understanding of standard specifications. Conversely, companies that are shut out of the standards development process may find themselves at a competitive disadvantage, forced to implement technologies developed by others rather than having the opportunity to shape technical directions.

III. CONCERNS WITH PROPOSED REQUIREMENTS

ATIS has identified specific concerns with the proposed ESTA and I-94 requirements that would significantly impede the ability to host international standards meetings in the United States and will create substantial barriers to participation by qualified technical experts from allied democracies that currently operate under the existing visa waiver program.

These changes are particularly inadvisable given that the individuals who would be most affected are nationals of Visa Waiver Program countries – trusted allies and partners with whom the United States enjoys strong diplomatic, economic, and security relationships. The VWP exists precisely because citizens of member countries have been determined to pose minimal security risks and to warrant streamlined entry procedures. Imposing burdensome and intrusive data collection requirements on VWP nationals undermines the fundamental purpose of the program and sends a troubling signal about U.S. openness to legitimate international business collaboration.

A. Mandatory Social Media Disclosure

The proposed mandatory collection of social media identifiers and platforms for the last five years raises necessity concerns for established business professionals. Standards meeting participants are typically mid-career or senior technical experts with long-term employment at well-known telecommunications companies, substantial professional networks, and verifiable track records of contributions to published technical standards. For such individuals, extensive social media history review provides limited marginal security value beyond what can be obtained through existing background checks, employer verification, and meeting host confirmation. The likelihood that such individuals from allied democracies would pose security threats is minimal, and extensive review of social media accounts is unlikely to provide meaningful additional security assurance.

This mandatory social media disclosure requirement will create a significant chilling effect on participation from allied democracies, particularly from European countries where privacy expectations and data protection standards differ from U.S. norms. Many prospective meeting participants will be unwilling to provide detailed information about their social media accounts and usage patterns, viewing such requirements as an unwarranted intrusion into their personal lives and an inappropriate condition for legitimate business travel. The disclosure of social media information may be viewed as particularly problematic in countries with strong privacy traditions and robust data protection laws.

B. Extensive Family Member Data Collection

The proposed collection of extensive family member data – including names, dates of birth, places of birth, current residences, and telephone numbers for family members who are not traveling to the United States – is not necessary for short-term business visitors. Information about a traveler's adult children, siblings, or parents who remain in their home countries does not appear relevant to assessing the traveler's admissibility or likelihood of complying with the terms of VWP admission. For business travelers making repeated short visits, family member information provides minimal security or immigration enforcement value, represents an intrusive expansion of collection scope, and has no bearing on the legitimacy of the traveler's purpose or on any reasonable assessment of security risks associated with their travel.

The privacy concerns for non-traveling family members are substantial. These individuals have no relationship with the U.S. government and are not seeking any benefit from the U.S. government. Requiring travelers to disclose detailed personal information about family members as a condition of business travel imposes on the privacy of those family members and may be viewed as an inappropriate and excessive demand.

The compliance burdens associated with collecting and maintaining family member information create practical difficulties for both travelers and their employers. Technical experts who travel frequently may find it difficult to maintain current and accurate information about extended family members, particularly in cases of blended families, estranged relationships, or other complex family situations. Employers who provide travel support services may be unable to assist employees in gathering required family information, increasing the burden on individual travelers.

C. Historical Contact Information Requirements

The proposed collection of telephone numbers for five years and email addresses for ten years raises practical necessity questions. While current contact information is clearly relevant for emergency communication and verification purposes, historical contact information from five to ten years ago has limited utility for travelers who have stable, long-term employment and residence histories.

The security value of decade-old email addresses for established professionals is particularly questionable. Email addresses often change due to employment transitions, service provider changes, or evolving communication preferences. Requiring travelers to reconstruct and document such historical information imposes substantial burden without corresponding security benefit for low-risk business visitors.

The proposed requirements for historical contact information, including detailed employment history and contact information for all employers and addresses spanning five to ten years, raise all the concerns identified above regarding social media and family member information (i.e., privacy impacts, chilling effects, etc.), along with additional specific concerns.

The impracticality of reconstructing five to ten years of employment and contact data for established business professionals is significant. Many technical experts may have difficulty

recalling specific details about previous employment, particularly for short-term positions or consulting arrangements they may have held in the past. The requirement to provide detailed information about positions held a decade ago, including supervisor names and contact information, imposes an unreasonable burden that may be impossible to satisfy in many cases. For a mid-career engineer with multiple prior employers, reconstructing 10 years of email addresses and supervisors would take hours, not the 22 minutes that CBP estimates.

The limited security value of historical employment information for established business professionals is apparent. Standards meeting participants typically have stable, long-term employment relationships with well-known companies in the telecommunications sector. Their professional credentials and backgrounds are well-established and can be readily verified through professional networks, published research, standards contributions, and other objective evidence. Requiring detailed reconstruction of decade-old employment information provides little or no additional security assurance and represents a disproportionate burden relative to the risk profile of these travelers.

The proposed collection of historical contact information spanning 5-10 years also raises significant data quality concerns. Applicants will frequently be unable to accurately recall or verify historical email addresses and telephone numbers from many years ago. This will lead to: (a) incomplete applications requiring follow-up and delay; (b) inaccurate information provided by applicants making good-faith efforts to comply but lacking complete records; and (c) inconsistencies between applications from the same individual over time as memory and available records change.

Finally, sophisticated bad actors intent on evading scrutiny could easily create fake or sanitized social media profiles or simply decline to disclose problematic accounts. The burden of extensive historical social media disclosure would therefore fall primarily on legitimate business travelers with established professional identities and nothing to hide, while providing limited marginal security benefit against determined bad actors.

D. Biometric and Metadata Collection

While ATIS understands the value of facial recognition with liveness detection to prevent fraudulent applications, the proposed collection of additional biometric modalities (fingerprints, DNA samples, iris scans) and IP address metadata raises concerns regarding the necessity of this information from VWP travelers. The VWP exists precisely because nationals of member countries have been determined through diplomatic negotiations to pose minimal security risks, warranting streamlined entry procedures. Collecting biometric data typically reserved for criminal investigations or high-risk populations undermines the fundamental premise of the VWP and suggests that these trusted travelers require the same level of scrutiny as individuals from countries not granted VWP status.

IV. IMPACT ON U.S. COMPETITIVENESS

The proposed ESTA and I-94 requirements will have significant adverse impacts on U.S. competitiveness in technology standards development and will undermine stated U.S. policy objectives for technology leadership.

A. Predicted Attendance Decline

Based on ATIS' experience and on direct feedback regarding these proposed changes from our most recent 3GPP meeting participants, ATIS predicts that there could be substantial reductions in participation by VWP country nationals in U.S.-hosted standards meetings if the proposed requirements are implemented.

The expected reduction in VWP country participation is particularly concerning because VWP countries include the United States' most important allies and technology partners. European countries, Japan, Korea, Australia, and other VWP member nations are home to leading telecommunications companies, cutting-edge research institutions, and highly qualified technical experts whose participation in standards development is essential to producing high-quality global standards.

The effect on consensus-based standards processes would be severe. As noted above, the 3GPP standards development process depends on active participation from diverse stakeholders representing different technical perspectives, different regional priorities, and different business models. When key stakeholders are unable or unwilling to participate effectively, technical decisions may be made without adequate input, resulting in specifications that fail to meet the needs of all stakeholders or that incorporate technical approaches that prove problematic in deployment

This would compound the already significant impact of enhanced vetting on non-VWP participants. Technical experts from China, India, and other countries that are not members of the VWP already face substantial hurdles in obtaining visas to attend meetings in the United States. The proposed ESTA changes will primarily affect VWP nationals, but the signal sent by these changes – that the United States is imposing increasing barriers to legitimate business travel – would likely lead to additional scrutiny and delays for non-VWP nationals as well. The combined effect would be a substantial reduction in international participation across all categories of travelers.

Perhaps most troubling is the immediate chilling effect that has already emerged from both U.S. and foreign meeting participants, who are expressing concerns regarding the viability of future meeting hosting in the United States. Even before the proposed requirements have been finalized, standards organizations and companies are discussing shifting meetings away from the United States to avoid the anticipated difficulties. This erosion of confidence in the United States as a viable meeting host represents a strategic loss that will be difficult to reverse even if the proposed requirements are ultimately modified or withdrawn.

B. Competitive Disadvantage in Meeting Hosting

The United States faces increasing competition from European and Asian venues for hosting international standards meetings. Other countries have recognized the strategic value of hosting such meetings and have taken steps to facilitate entry and streamline business visitor processes.

European and Asian countries offer streamlined business visitor processes specifically designed to facilitate international business collaboration. The European Union allows visa-free entry for most business visitors from major economies, and even when visas are required, the application process is typically faster and less burdensome than U.S. processes. China, despite its own visa requirements, has shown willingness to expedite visa processing for standards meeting participants when it serves China's interest to host meetings. Japan and Korea both offer efficient visa processes and have excellent facilities for hosting large international meetings.

No equivalent social media or family data requirements exist in alternative host countries. While other countries conduct security screening of international visitors, none impose the extensive and intrusive data collection requirements that are proposed for the U.S. ESTA system. This differential in requirements would place the United States at a significant competitive disadvantage and make it more difficult to attract international meetings.

C. Competitive Disadvantage for U.S. Industry

The decline in U.S.-hosted standards meetings would translate directly into competitive disadvantages for U.S. telecommunications companies. As noted above, U.S. companies benefit significantly from the ability to participate effectively in standards development, and that participation is facilitated when meetings are held in the United States. When meetings shift to other regions, U.S. companies face increased travel costs, reduced ability to send diverse delegations, challenges related to time zones and travel time, and reduced influence over technical outcomes.

Moreover, the long-term effects on U.S. leadership in technology standards would extend beyond individual companies to affect the overall competitiveness of the U.S. technology sector. Standards influence translates into market advantages, intellectual property revenue, and strategic positioning in emerging technology areas. If the United States loses its position as a leader in standards development, U.S. companies and the U.S. economy more broadly would suffer long-term competitive harm.

D. Contradiction with Policy Goals

The proposed ESTA and I-94 requirements directly contradict stated U.S. policy goals and undermine ongoing U.S. government initiatives to promote technology leadership.

The Administration has placed great emphasis on U.S. leadership in 6G wireless communications and on U.S. competitiveness in technology more broadly. In December 2025, President Trump issued a National Security Presidential Memorandum, “Winning the 6G Race” explicitly noting that “it is the policy of the United States to lead the world in 6G development” and directing that

"certain steps are necessary to achieve the goal of this policy, including steadfastly advancing American interests in the international standards bodies that will play a crucial role in 6G development."[3] The proposed ESTA/I-94 requirements directly contradict this Presidential objective by making it more difficult to host the very meetings where these standards bodies conduct their work.

This also runs counter to the previously mentioned USPTO SPARK Pilot Program that noted that "technical standards are a key component of the innovation ecosystem - from telecommunications and artificial intelligence to manufacturing and cybersecurity" and that "American leadership in standards development is essential to innovation, competitiveness, and national security."[4]

Immigration policies that undermine technology competitiveness objectives create incoherent and ultimately self-defeating U.S. policy. When different agencies of the federal government work at cross-purposes—with some agencies promoting technology leadership while others erect barriers to the international collaboration necessary for that leadership—the overall effectiveness of U.S. policy is severely compromised. CBP should carefully consider how the proposed ESTA changes align with broader U.S. policy objectives and should work with NTIA, FCC, OSTP, and other technology policy agencies to ensure that immigration policies support rather than undermine technology competitiveness.

V. RECOMMENDED SOLUTIONS

ATIS believes that CBP's legitimate security objectives can be achieved through more targeted and less burdensome requirements, and that specific accommodations should be made for verified standards meeting participants who present minimal security risks.

A. Modifications to Proposed Requirements

ATIS recommends that CBP reconsider or modify the proposed data collection requirements in several important respects to reduce unnecessary burden while maintaining appropriate security screening.

Social media information collection, if it is included at all, should be limited to professional platforms and shorter timeframes. Rather than requiring disclosure of all social media accounts and usage history, CBP could focus on professional networking platforms such as LinkedIn that are directly relevant to assessing travelers' professional backgrounds and business purposes. The timeframe for required disclosure should be shortened from five years to one or two years, reducing burden while still providing relevant information about recent social media activity.

Family member data requirements should be eliminated or substantially reduced for business visitors. At a minimum, requirements should be limited to immediate family members (spouse and

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[3] "Winning the 6G Race," *The White House*, December 19, 2025, https://www.whitehouse.gov/presidential-actions/2025/12/national-security-presidential-memorandum-nspm-8-0bda/.

[4] "USPTO to Launch SPARK Pilot Program to Strengthen U.S. Standards Development Leadership," *United States Patent and Trademark Office,* January 13, 2026, https://www.uspto.gov/about-us/news-updates/uspto-launch-spark-pilot-program.

minor children) and should not extend to parents, siblings, adult children, or other relatives. Family member information should also not be required for short-term business visitors whose travel purpose and professional background can be readily verified through other means.

B. Alternative Approaches for Standards Meeting Participants

ATIS recommends the consideration of alternative approaches for standards meetings participants such as a broader categorical exemption or a streamlined process for regular standards meeting participants including those from non-VWP countries.

There is strong precedent for categorical exemptions in existing visa policies and procedures. U.S. policy has long recognized that certain categories of travelers – diplomats, academic researchers participating in scholarly conferences, athletes participating in sporting events – present different risk profiles than ordinary tourists and warrant tailored entry procedures. Standards meeting participants are similarly situated. They are traveling for a specific, limited, and easily verified purpose. They are sponsored by recognized organizations. They are typically established professionals with substantial equities in their home countries and no intention to violate the terms of their admission to the United States.

ATIS also recommends that CBP consider establishing a trusted traveler program for regular standards meeting participants, analogous to the successful Global Entry and TSA PreCheck programs. This approach would recognize that frequent business travelers attending documented standards meetings present a different risk profile from occasional tourists while maintaining robust security screening.

VI. CONCLUSION

The proposed ESTA and I-94 requirements would create unprecedented barriers to legitimate business collaboration between U.S. technology companies and their international partners. While CBP's security concerns are legitimate and important, the specific requirements proposed are poorly tailored to the risk profiles of standards meeting participants and will impose substantial burdens that far exceed any incremental security benefits.

The changes would undermine stated U.S. policy goals for technology leadership in critical areas such as 6G wireless communications, artificial intelligence, and other emerging technologies. The ability to host international standards meetings in the United States is essential to maintaining U.S. influence in standards development, ensuring that U.S. technical approaches and policy priorities receive adequate consideration, and promoting the competitiveness of U.S. technology companies. Immigration policies that make it more difficult to host such meetings work directly against U.S. strategic interests and should be reconsidered.

Coordination with technology policy agencies to align immigration security with other important objectives is essential. Before implementing these changes, CBP should consult with NTIA, FCC, OSTP, NSA, CISA, and other agencies responsible for promoting U.S. technology leadership to ensure that ESTA and I-94 changes support rather than undermine broader U.S. policy goals. Such coordination could include joint review of the impacts of proposed immigration policy changes on

technology competitiveness and regular consultation between CBP and technology policy agencies regarding standards development activities and international business collaboration needs.

The modifications and targeted exemptions recommended above can address legitimate security concerns while preserving U.S. competitiveness in standards leadership. By focusing data collection on information that is actually relevant to security assessment, by reducing unnecessary intrusions into travelers' privacy, and by recognizing that verified business travelers present different risk profiles than ordinary tourists, CBP can achieve its security mission while supporting rather than undermining U.S. technology policy objectives.

ATIS appreciates the opportunity to provide these comments and stands ready to engage further with CBP and other agencies on these important issues. ATIS is available for further consultation and technical briefings regarding standards development processes, meeting logistics, and the specific needs of standards meeting participants. ATIS is committed to working collaboratively with CBP toward balanced solutions that address security needs while preserving the ability of the United States to host international standards meetings that are essential to U.S. technology leadership and economic competitiveness.

Respectfully submitted,

David Young
Vice President of Technology Policy & Government Relations
Alliance for Telecommunications Industry Solutions (ATIS)
1200 G Street N.W.
Suite #500
Washington, D.C. 20005

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