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Seth D. Renkema
Branch Chief
Economic Impact Analysis Branch
U.S. Customs and Border Protection
Office of Trade, Regulations and Rulings
90 K Street NE
10th Floor
Washington, DC 20229-1177

Re: Agency Information Collection Activities; Revision; Arrival and Departure Record (Form I-94) and Electronic System for Travel Authorization (ESTA)

Docket: OMB Control Number 1651-0111

Dear Mr. Renkema:

On behalf of the Global Business Travel Association (GBTA), thank you for the opportunity to comment on the Department of Homeland Security (DHS), U.S. Customs and Border Protection's (CBP) information collection concerning revisions to the Arrival and Departure Record (I-94) and Electronic System for Travel Authorization (ESTA).

This comment outlines GBTA's perspective on the proposed revisions to the I-94 and ESTA information collection as they relate specifically to international business travel. While GBTA supports DHS and CBP's efforts to enhance border security and improve the traveler experience, we are concerned that certain expanded data collection requirements may create unintended operational and economic impacts for managed corporate travel programs. This letter explains how these changes could affect business travelers, employer compliance obligations and U.S. competitiveness, and offers recommendations to help balance security objectives with international data protection standards and efficient, safe travel.

GBTA is the world's premier business travel and meetings trade organization serving stakeholders across six continents. GBTA and its 9,000+ members represent and advocate for the \$1.57 trillion global business travel and meetings industry. GBTA and the GBTA Foundation deliver world-class education, events, research, advocacy, and media to a growing global network of more than 28,000 travel professionals and 125,000 active contacts. Collectively, we estimate our members directly control more

than \$363 billion of global business travel and meetings expenditures annually and represent every facet of the global travel industry marketplace. Business travel enables economies to expand, compete and innovate through face-to-face connections — while contributing \$484 billion to the U.S. GDP, supporting six million jobs in the United States and making up 1.9% of the total U.S. economy in 2022.¹

Business travel refers to trips taken for professional purposes, rather than personal enjoyment or leisure. These journeys include visiting clients, meeting partners, attending training and conferences, supporting operations and internal engagement, and representing organizations in negotiations and at events. It is an essential enabler of commerce, trade and diplomacy. For companies and governments, it drives growth, builds relationships, and ensures organizations can collaborate in-person with their stakeholders worldwide. For employees, it creates career opportunities and professional development.

Business travel does not start and end with a ticket. From the moment a traveler leaves home until they return, an entire ecosystem is involved: ground transportation, parking, air, rail, hotels, travel management/agency services, meeting venues, booking platforms, payments systems, and digital tools.

Each part of this chain contributes to making the journey safe, efficient, compliant with company/organizational policies, and sustainable. Understanding business travel requires seeing all these connections as a single, integrated system, not just a series of individual transactions or decisions.

Most large and medium-sized organizations have established formal travel programs to keep employees safe, manage costs, and deliver on wider corporate goals. Managed travel is guided by company policies and overseen by travel managers who often are part of procurement teams. These programs include negotiated contracts with suppliers (airlines, hotels, etc.) and service providers, as well as preferred travel management company partners and forms of payment. Increasingly, managed travel programs are used as levers for change, reflecting organizational culture and targets, and prioritizing cost management or, conversely, sales growth or employee wellbeing. With managed travel, organizations address their own legal and corporate obligations while also influencing how the wider travel ecosystem develops.

On January 27, GBTA published its most recent industry [sentiment poll](#), gathering feedback from 571 business travel professionals—corporate travel managers, travel suppliers and travel management company (TMCs) representatives—from 40 countries about their expectations and concerns for the coming year.

The survey covered numerous topics related to business travel, including general industry outlook for 2026 and proposed changes to the ESTA application process.

Across different markets and industry roles, the leading concerns are similar:

¹ Source: GBTA U.S. Economic Impact Study: Business Travel's Impact on Jobs and the U.S. Economy

affordability of travel (76%) and ease of cross-border entry/exit permissions (57%), with U.S. corporate travel managers highlighting these issues most strongly. Entry and exit permissions are an especially pressing concern for travel buyers whose employees take over 10,000 trips annually (79%) and for suppliers (72%).

The proposed changes to the ESTA (Electronic System for Travel Authorization) requirements are anticipated to significantly affect corporate travel managers within the U.S. and coming from the Visa Waiver Program countries, potentially undermining confidence in travel to the United States. Among poll respondents whose organizations regularly send employees to the U.S., 78% indicate they are very concerned (42%) or somewhat concerned (36%) about these developments.

Industry professionals cited several key challenges related to managing travel to the United States. The most prevalent concern, voiced by 65% of respondents, is the increased difficulty associated with organizing travel to the U.S. Additionally, 64% highlighted the growing complexity of sending personnel to the country, while 63% pointed to rising costs associated with conducting business in the U.S. Other notable issues include employee reluctance to travel (61%) and the logistical difficulties of hosting meetings within the United States (53%).

Privacy concerns are especially pronounced among European travel professionals, with two-thirds (67%) reporting that their employees would prefer not to travel to the U.S. if required to disclose extensive personal information, as stipulated by the proposed ESTA requirements.

The anticipated impact of these requirements has prompted many organizations to reconsider their travel strategies. Specifically, 43% of respondents indicated that their companies are more likely to hold meetings outside of the United States, while 29% expect a reduction in near-term business travel to the U.S. Furthermore, 25% foresee a decrease in long-term travel to the country, and 19% plan to revise travel policies to limit the frequency of U.S. trips.

Responses from travel managers, suppliers, and travel management company professionals also suggest that employee willingness to travel to the United States could be waning, with 64% believing corporate staff may be less inclined to undertake such trips. Moreover, 60% feel that planning travel to the U.S. has become increasingly “unpredictable” and “risky.”

GBTA applauds DHS and CBP for its efforts to improve the travel experience for business travelers and improve the overall travel experience for the public. However, while the changes that were submitted and approved by the Office of Management and Budget (OMB) through an emergency clearance process could enhance the safety of travelers, it could have unintended negative consequences on managed corporate travel programs. We urge caution because applying these changes and proposed changes to business travelers could create additional hurdles and burdens for travelers wishing to conduct face-to-face business within the United States from abroad, and for U.S. firms and other entities seeking to bring non-U.S. employees, partners, and others to meetings they’re conducting in the U.S.

We recognize CBP's commitment to security and fraud prevention. However, the proposed requirements — such as five years of social media identifiers, ten years of email addresses, five years of phone numbers, expanded family details, and potential biometric data — raise significant concerns under international data protection standards, particularly the EU General Data Protection Regulation (GDPR). These measures risk creating barriers to lawful business travel and could undermine U.S. competitiveness in global commerce. Specifically, the collection of historic social media, phone numbers, email addresses and detailed family information could require digging through old accounts, backups and records, a process that is burdensome and could take days or weeks to gather a complete and accurate history, increasing the risk of delays or application rejections due to omissions.

Under GDPR, personal data of EU residents must be limited to what is necessary for the stated purpose, processed lawfully and transparently, and transferred outside the EU only under adequate protection, with clear retention and sharing safeguards, such as the EU-US Data Privacy Framework.

The proposed ESTA changes conflict with these principles in that collecting social media history and biometrics goes beyond what is necessary for border security. The proposal lacks clarity on retention periods, onward sharing, and safeguards for EU citizens. And expanded sensitive data collection could jeopardize the adequacy status of the EU-US Data Privacy Framework, triggering regulatory challenges and litigation.

Furthermore, the proposed expansion of ESTA data collection creates a significant "chilling effect" on global business travel operations by increasing administrative friction and deterring high-value commerce, increasing processing time and costs for companies managing frequent business travel. With CBP's estimated application time rising to 22 minutes per traveler, organizations managing high-volume travel face a substantial increase in logistical complexity and increased scrutiny of applications are expected to make the application more involved for travelers seeking ESTA approvals. The turnaround time for ESTA approvals could extend beyond the usual same day or 72-hour window, particularly during peak travel seasons or before major events like the FIFA World Cup or Olympics.

GBTA anticipates potential losses in the billions in travel-related revenue as a direct result of these stricter entry requirements. Many EU business travelers may refuse to provide such information, viewing it as incompatible with GDPR and personal privacy norms, thereby forgoing a trip. This anticipated reduced willingness to travel to the U.S. could harm trade, investment, and face-to-face collaboration, key drivers of economic growth.

Operationally, the transition to a mobile-only application platform serves as a digital barrier for many professionals; corporate security protocols often prohibit employees from installing foreign government software on work devices, while those without compatible hardware are effectively locked out of the [ESTA system](#). These barriers risk

diverting international investment and professional services to alternative global markets with more streamlined and privacy cognizant entry procedures. For some travelers, not having access to a smartphone or difficulty navigating the mobile app could slow or block their ability to apply.

To achieve security objectives while respecting international privacy standards, CBP should adopt a balanced approach that limits data collection to fields with demonstrable security utility and avoids unnecessary requirements such as social media and biometric data unless narrowly justified. CBP should provide full transparency by publishing retention periods, sharing restrictions, and compliance measures aligned with GDPR principles – and implement these changes gradually through a phased rollout to allow stakeholders and business travelers time to adapt. CBP should explore alternative compliance options, like using secure systems for data exchange among corporate travel managers and implementing risk-based questioning instead of blanket requirements to reduce disruptions to legitimate business travel.

GBTA urges CBP to adopt a balanced approach that strengthens security without imposing disproportionate burdens or creating conflicts with international data protection laws. Doing so will preserve the efficiency of lawful, legitimate business travel and maintain the U.S.'s position as a premier destination for global business.

We would welcome the opportunity to discuss this matter with you or a member of your team.

Respectfully,



Suzanne Neufang
Chief Executive Officer
Global Business Travel Association