



December 21, 2017

Desk Officer, Department of State
Office of Information and Regulatory Affairs
Office of Management and Budget

Bureau of Consular Affairs
Visa Office
U.S. Department of State

RE: U.S. Travel Association, American Hotel & Lodging Association, and U.S. Chamber of Commerce Comment on DOS-2017-0032, *Supplemental Questions for Visa Applicants* (DS-5535) (November 27, 2017) (OMB 1405-0226)

The U.S. Travel Association, the American Hotel & Lodging Association, and the U.S. Chamber of Commerce collectively submit the following comment to the State Department's request for public comment on Form DS-5535, *Supplemental Questions for Visa Applicants*. This is the third time we have collectively commented on this proposal since the State Department sought approval from the Office of Management and Budget (OMB) to implement these increased vetting measures on an emergency basis in May 2017. Since the underlying policy has not substantially changed, our organizations are resubmitting our original comments as an attachment to this letter.

We note that the State Department has revised its estimates regarding the amount of people who will be subject to these enhanced screening measures from 65,000 to 70,500. Given our prior concern that the number of respondents might increase sharply after implementation, we are pleased that this is a very modest increase over prior State Department estimates. However, as the Department seeks to extend this information collection process for the next three years, we urge the Department and OMB to continually monitor these estimates and update the regulated public accordingly. This type of agency transparency will help ensure that the population of travelers subject to these enhanced screening measures does not significantly increase without a legitimate, security-related justification that necessitates a drastic change in policy. Expanding the application of these requirements to low-risk travel populations will have the likely result of slowing down legitimate international travel without providing our nation any significant security improvement. Any material change in the scope of this policy should be preceded by outreach to Congress, the business community, and the public.

Given the strong emphasis the administration has placed on visa security, we would like to request a formal meeting with State Department and OMB officials to discuss this issue, as it will be the subject of ongoing evaluation. Such a dialogue would help us provide the State Department and OMB substantive feedback and insight on how this enhanced screening measure affects stakeholders. We believe our collective insights can help the government implement this policy in a manner that enhances our national security and facilitates legitimate international travel to the U.S., which will help drive sustained economic growth in the U.S.

We appreciate the continued solicitation of public comment on this matter. Thank you for considering our views.