

ANSI Comments to CBP on Form I-94/ESTA Changes

OMB Control Number 1651-0111

TO: U.S. Customs and Border Protection

VIA: CBP_PRA@cbp.dhs.gov

RE: Agency Information Collection Activities; Revision; Arrival and Departure Record (Form I-94) and Electronic System for Travel Authorization (ESTA) [OMB Control Number 1651-0111]

FROM: American National Standards Institute (ANSI)

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Standards Development is a National Security Priority

The American National Standards Institute (ANSI) respectfully submits these comments on the proposed revisions to Form I-94 and ESTA. ANSI serves as the official U.S. representative to the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), coordinating U.S. participation in these two international standards development organizations involving thousands of experts from industry, government, and academia. ANSI also accredits more than 230 standards development organizations; accreditation by ANSI signifies that an organization's voluntary consensus standards development procedures meet ANSI's requirements for openness, impartiality and consensus. These requirements are consistent with World Trade Organization principles for the development of international standards.

International standards shape critical technologies, including 5G and 6G telecommunications, artificial intelligence, cybersecurity protocols, and advanced manufacturing systems. The development of these standards requires sustained international collaboration through multi-year processes, with face-to-face meetings essential for building consensus and securing technical leadership positions. When these meetings occur in the United States, American participants gain essential strategic advantages: lower travel costs enable broader U.S. participation, in-person presence facilitates technical leadership, and networking opportunities strengthen U.S. influence over standards that will govern global markets and affect billions of dollars in international trade.

However, international experts must be able (and encouraged) to travel to the United States for this strategy to succeed. As the U.S. representative to ISO and IEC, ANSI coordinates participation in international technical committees where standards are developed. ANSI-accredited standards developers convene committees of technical experts to develop standards used globally. These committees bring together scientists, engineers, researchers, and technical experts from around the world to develop the specifications that will govern critical technologies. U.S.-hosted meetings are essential to U.S. leadership, but this can only happen if international participants are willing to attend.

The strategic value of U.S.-hosted meetings on critical technologies was recently demonstrated in January 2026, when ISO/IEC JTC 1 Subcommittee 37 on Biometrics convened in New York City. The meeting brought together 67 in-person delegates from 15 countries, including a strong U.S. delegation that accounted for 40% of total attendance. This robust attendance demonstrates how domestic venues work to strengthen U.S. technical influence by increasing U.S. delegate participation, enabling more effective engagement in working group discussions, and deepening professional relationships with international counterparts on critical technologies. Should entry processes become burdensome, standards organizations will choose to meet elsewhere, disadvantaging U.S. participants and diminishing U.S. influence.

Recognition of the importance of U.S.-hosted standards meetings to U.S. leadership is well-established. In June 2024, the National Security Agency (NSA) and Cybersecurity and Infrastructure Security Agency (CISA) published "Recommendations for Increasing U.S. Participation and Leadership in Standards Development,"¹ recognizing that international standards development is "critical to national and economic security." The report, which represents the consensus input of a public-private cross-sector working group, explicitly states:

It is...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. This means that the U.S. government should identify visa challenges that may exist around standards meetings—e.g., restrictions or flags relating to specific employers, industry sectors, or technical backgrounds.

The report identifies the declining number of international standards meetings hosted in the United States as a strategic concern, noting that some standards developing organizations "have avoided meeting in the U.S. at the strategic urging of members, claiming logistical challenges, which put U.S. participants at a disadvantage." The report recommends that "the U.S. government should position standards development activities—and meetings in the U.S.—as critical to national and economic security."

Barriers to international participation in meetings held in the United States would shift hosting responsibilities disproportionately to other regions, where governments may actively facilitate international attendance. Europe (Germany in particular), and China have made significant efforts to become preferred locations for international standards committees and frequently host meetings. Hosting standards meetings is not a neutral function; hosts shape agendas, meeting cadence, informal interactions, and often provide committee and technical leadership, all of which influence technical outcomes and timelines. As meetings move outside the United States, U.S. stakeholders would face higher costs and reduced ability to engage consistently, weakening U.S. leadership in standards development and diverging from the [United States Standards Strategy](#).

Maintaining the United States as a welcoming venue for international standards meetings serves multiple national interests expressly advanced by the current administration:

¹ See https://media.defense.gov/2024/Jul/30/2003514270/-1/-1/0/ESF_ISG_PAPER.PDF

- The administration's AI Action Plan explicitly recognizes that standards have geostrategic value and are key to AI adoption globally
- U.S.-led standards are crucial to attaining energy dominance, as reflected in Executive Orders and Department of Energy policy documents
- U.S. policy promotes standards-based markets for critical minerals
- Standards commitments underpin the Technology Prosperity Agreements that the Administration has negotiated with key trading partners.

In December 2025, the administration articulated its intent to ensure the U.S. leads on the international stage in the development of next generation mobile communications networks (6G). In this Presidential Memorandum, the President noted 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..."²

And just last month, the U.S. Patent and Trademark Office (USPTO) announced its Standards Participation and Representation Kudos (SPARK) pilot program offering incentives to participants in standards development. In announcing the SPARK initiative, USPTO Director John A. Squires stated that "American leadership in standards development is essential to innovation, competitiveness, and national security."³

ANSI fully supports comprehensive security vetting and does not question CBP's authority or objectives. Our comments address whether the proposed implementation approach aligns with the U.S. government's call for "American leadership" in standards development and recommendation for a "stable, predictable regulatory and policy environment that welcomes foreign participants in standards-related meetings."

Specific Concerns About Proposed Changes

1. Mandatory Social Media Disclosure (5 Years): While social media may provide valuable security information, mandatory five-year disclosure for all ESTA applicants may deter technical experts from attending U.S.-hosted standards meetings. Engineers and researchers working on emerging technologies—the very experts critical to U.S. standards leadership—may be reluctant to disclose extensive personal social media for routine business travel to participate in transparent, documented technical work. This reluctance often reflects professional privacy norms rather than security concerns.

The NSA/CISA report specifically warns against "restrictions or flags relating to specific employers, industry sectors, or technical backgrounds" that create visa challenges. In this regard, technical experts use diverse international platforms that may not align with U.S. platform categories, creating compliance challenges as such platforms may not allow easy export of five-year post histories. Further, sophisticated bad actors can create clean social media profiles; and individuals with genuine intent to harm are unlikely to voluntarily disclose accounts revealing

² See <https://www.whitehouse.gov/presidential-actions/2025/12/national-security-presidential-memorandum-nspm-8-0bda/>

³ See <https://www.uspto.gov/about-us/news-updates/uspto-launch-spark-pilot-program>

concerning activity. Meanwhile, legitimate business travelers face increased application complexity, privacy intrusions, potential for subjective entry denials based on misinterpreted content, and risk of denial for innocent associations.

2. Expanded Data Fields (Family Information): CBP proposes collecting family member names, dates of birth, residencies, five years of telephone numbers, and ten years of email addresses—substantial expansion approaching immigration-level data collection for temporary business visits. For established experts making routine trips to standards meetings, this level of detail may feel disproportionate and create practical compliance challenges. When standards organizations select meeting venues globally, cumulative entry process burdens influence venue decisions. **If U.S. entry is perceived as significantly more complex than alternatives, standards organizations will choose to meet elsewhere, directly undermining the goal of establishing the U.S. as a venue of choice for standards meetings.**

3. Mobile-Only ESTA Application: While mobile applications offer security advantages, mobile-only requirements may create barriers for travelers from organizations with restrictive corporate security policies (e.g., prohibitions on application installation, using personal devices for business travel, or transmitting personal data through company devices) or accessibility needs. The three-month transition period may be insufficient to identify and address these issues.

Overall, these changes may create significant burdens on international travelers coming to the U.S. for standards meetings. CBP estimates 22 minutes per ESTA Mobile Application for 14,484,073 annual respondents—totaling 5,310,827 burden hours. But this calculation significantly underestimates actual burden, as it accounts only for form completion time, not substantial preparation required: gathering five years of social media information; assembling ten years of email addresses; documenting family member information; and retrieving photo metadata. For business travelers who have not maintained comprehensive historical records, actual preparation time could easily exceed 2-3 hours.

Recommendations Aligned with National Security Priorities

To balance security objectives with national interests in standards leadership, ANSI recommends the following approaches:

1. Risk-Based Screening Approaches: Implement differentiated screening based on traveler risk profiles rather than universal requirements for all applicants. Business visitors with established compliance records, documented meeting participation, and clean backgrounds could undergo streamlined screening, while travelers with risk indicators receive enhanced vetting. This focuses intensive resources where most needed while reducing friction for documented, low-risk business travelers. Specific mechanisms could include: reduced data requirements for historically compliant travelers (i.e., grandfathering) and those who have been vetted by reliable corporate sponsors; shorter data-disclosure timeframes (2-3 years vs. 5 years) for low-risk categories; and progressive vetting that escalates only when initial screening raises questions.

2. Trusted Traveler Mechanisms for Business Visitors: Develop concepts similar to Global Entry for documented business travelers making routine trips to U.S.-hosted professional meetings. Standards development organizations can verify participation in legitimate meetings. Pre-clearance mechanisms would allow frequent business travelers to provide comprehensive information once with periodic updates, rather than repeating extensive data collection for each trip. This could include: verification through recognized standards organizations; pre-clearance with 2-3-year validity for established business visitors; and fast-track processing for documented meeting participants.

3. Interagency Coordination and Monitoring: CBP should coordinate with NSA, CISA, and other national security stakeholders to ensure enhanced screening measures align with government standards strategy priorities, and establish metrics to monitor impacts. Specific mechanisms should include: coordination with NSA/CISA on implementation approaches for travelers attending standards meetings; quarterly consultation with standards organizations and business travel associations; tracking application completion rates vs. abandonment rates; monitoring trends in U.S.-hosted international standards meetings by technology sector; assessing whether meetings are being moved to other countries citing entry process concerns; and establishing adjustment protocols if deterrent effects on legitimate business travel emerge.

Accordingly, ANSI proposes that the U.S. government consider an exemption or streamlined entry process for travel to international standards development, standardization, qualification, and certification related meetings and conferences (including those of U.S. domiciled SDOs and consortia) that are critical to advancing technologies vital national and economic security. This targeted exemption would help ensure that essential foreign experts can participate fully in U.S.-hosted standards meetings and conferences without unnecessary administrative hurdles, thereby reinforcing American leadership and supporting the overarching policy goals articulated by the administration and relevant agencies. Such a provision would maintain rigorous security vetting while promoting the stable, predictable environment needed for U.S. competitiveness in global standards development.

Conclusion

U.S. leadership in international standards development—particularly for critical and emerging technologies—serves vital national security and economic interests. As NSA and CISA recognized in their recommendations for increasing U.S. participation and leadership in standards development, maintaining a "stable, predictable regulatory and policy environment that welcomes foreign participants in standards-related meetings" is essential to this leadership.

The proposed ESTA changes, while serving legitimate security objectives, may create unintended friction, creating policy that counters NSA/CISA recommendations. ANSI respectfully urges CBP to coordinate with NSA, CISA, and other national security stakeholders to ensure that enhanced screening measures do not inadvertently undermine the government's stated goal of increasing U.S. participation and leadership in standards development.

ANSI respectfully requests that CBP:

1. Coordinate with national security agencies that have identified standards participation as a strategic priority to align implementation approaches
2. Develop trusted traveler mechanisms for business visitors with established compliance records attending documented professional meetings
3. Implement risk-based approaches that focus intensive screening on higher-risk travelers while streamlining processes for documented, repeat business visitors
4. Monitor strategic impacts through metrics on application completion rates and trends in U.S.-hosted international standards meetings

With interagency coordination and thoughtful implementation, CBP can achieve both robust security and continued U.S. leadership in international standards development—objectives that are complementary, not contradictory.

ANSI stands ready to serve as a resource and welcomes continued dialogue on these important issues.

Respectfully submitted,

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