



**Council of
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SUBMISSION

to the

U.S. Department of Homeland Security

**Comments on Documents Required for Travel Within the Western
Hemisphere: Advance Notice of Proposed Rulemaking**

by the

*Council of Tourism Associations of British Columbia,
in cooperation with the Cascadia Discovery Institute,
Cascadia Centre, Seattle, Washington*

Re: RIN 1651-AA66 RIN 1400-AC10

OCTOBER 28, 2005

Summary

The Council of Tourism Associations (COTA) of British Columbia is an advocacy organization that represents more than 18,000 tourism operations across the province. Collectively, tourism in British Columbia welcomes more than 6 million visitors from the United States annually. From our immediate neighbours in Washington State, Idaho, Montana and Alaska, to markets served throughout the U.S., we are an important destination today and a growing attraction in wilderness, urban, cultural and recreational adventures.

We value the security of the borders between Canada and the United States; a safe and secure tourism industry is a healthy industry. At the same time, however, our members are extremely concerned about the proposed rulemaking on required documents, and its adverse impacts on visiting U.S. Citizens.

To this end, we would suggest the following in defining and implementing documents to be deemed acceptable by the Secretary of Homeland Security to be sufficient to denote identity and citizenship.

KEY COMMENTS

1. **Mount a large scale communications campaign**, targeting U.S. citizens and the travel industry on the fact that passports will not be needed until the implementation date
2. **Push back the implementation date until January 1, 2008 for all modes of travel**, so that surface transportation does not gain a competitive edge on sea/air modes.
3. **Clarify and improve the definition of "Alternative Secure Documents"** to make documents easily accessible in availability, cost and benefits

Tourism: An Integrated Relationship between Canada and the U.S.

Canada is the United States' greatest trading partner, and it goes both ways. Tourism in both countries is a major player in regional and national economies. Loss of this essential revenue will certainly impact both countries' bottom lines.

Our two countries have a long tradition of co-mingling through tourism, visiting friends and relatives, and business travel. The more we directly experience each other's culture, as opposed to what we see on TV or movies, the more we understand and appreciate each other. Although Canada and the U.S. are sovereign countries, the relationship between their peoples is closely linked through cultural and family ties.

Impacts of Initiatives Described in the Advanced Proposed Rulemaking

The Canadian Tourism Commission estimates a loss of 797,000 U.S. visitors to British Columbia by 2008: a 13% reduction. The potential loss of this market would have a devastating impact on our members, as well as suppliers in Canada and the United States that serve our industry. This is one of five broad categories of impacts, described as follows:

1. Impacts of Uncertainty in Changing Policies:

Erroneous media coverage of the proposed rulemaking has already created uncertainty within the travel and tourism industry. Although we have worked hard to clarify that passports are not required today, the large amount of misinformation has already led to cancelled trips throughout British Columbia.

2. Reduced Travel to British Columbia:

Under 20% of U.S. adults have passports. This is highly variable by geography as well, with New York, San Francisco and Miami having the highest proportion of residents with passports. On the other hand, the balance of U.S. citizens (nearly 80%) are not passport holders. Consequently this market is at risk for:

- Increasing cost of travel to meet documentation requirements
- Deciding not to travel
- Making other travel choices

Due to our proximate location 2 hours north of Seattle, with over 40% of the U.S. market to British Columbia as same day trips, the industry is exposed in particular to the choice to not travel.

3. Reduced Travel by British Columbians to the U.S.:

About 44% of B.C. residents have passports. Our province produces 6 million visits to the U.S. annually. This market is threatened due to the same risks described above, due to the increased cost of travel and perception that crossing the border will be a hassle.

4. Impacts on Alaska Cruise ship Market:

Cruiselines have used Vancouver as a gateway from the lower 50 States to Alaska for many years. Nearly 700,000 American cruise ship passengers a year use travel through Vancouver. The proposed rulemaking threatens this cruise ship market due to the increased costs of obtaining a passport, and the fact that passengers stay in Canada for less than 4 hours.

5. Transportation Mode Impacts

The proposed rulemaking calls for 2006 and 2007 implementation timelines by modes. This unfairly penalizes air and sea modes of travel, as compared to land operators. Due to the diversity of travel modes (Amtrak, highway, ferry, cruise, air, etc.) from British Columbia to the U.S., the differing dates for implementing the proposed rule will unfairly harm one transportation mode over another.

Solutions Need to be Advanced with Tourism and Travel Industry

COTA is active in advancing solutions and is a ready partner to achieve the objectives of securing travel ID. We have actively participated in bi-national efforts such as the Perimeter Clearance Coalition, as well as working with border interests in the Pacific Northwest Economic Region.

We support the general principle that legitimate travelers should be facilitated, while securing our countries from threats.

1. Broad-based Industry-Government Communications Campaign

The tourism industry is at the forefront of interacting and talking to travelers. As a result, a campaign targeting U.S. citizens and the travel industry on the fact that passports will not be needed until the implementation date is necessary. Furthermore, when the details of the documentation requirements are available, consumer education is needed immediately so as to minimize the impact of travelers who may opt not to travel.

2. Documentation solutions need to be available and accessible

The primary driver for the potential losses to the B.C. tourism industry is from the lack of availability of proposed new documentation. Cost, access, administration requirements and speed of obtaining documentation are major implementation issues that have not been matured.

3. NEXUS Program is a possible ID type, but significant changes needed

COTA views the NEXUS program as a strong possibility for being recognized as a tool DHS should use to denote identity and citizenship.

The BC-Washington State border has long been a pioneer in low-risk pre-approved expedited border clearance programs, with as much as 150,000 members during the 1990's. However, NEXUS only has 90,000 members at present for both countries – insufficient for presenting itself as a viable solution.

The passport does not carry the extra security measures that the NEXUS does, and therefore requires that persons crossing the borders need to stop and physically show their passports and be interviewed by border guards. NEXUS allows for the traveler to be pre-cleared in advance of the physical border, allowing for better security and takes the line ups and hassle away from the border. A target should be set (e.g. 25%) for the total border transactions that use this form of ID.

Should NEXUS be advanced as an acceptable ID, it needs to be augmented as a NEXUS Plus program that:

- has a dramatically increased membership size;
- is widely available to potential members (e.g. integrated on passport applications);
- reduced in cost, particularly for families
- is available to all modes as a single program, and interoperable with the TSA; and
- provides 24/7 hours of operations.

Due to the strong stakeholder relationships and high take-up rate for existing programs, the Seattle-Vancouver corridor represents a logical place for future projects for next generation NEXUS pilots.

A day pass program for infrequent travelers should be implemented along with the NEXUS program, and an exemption should be applied to the ferry operations since they are an extension of the national highway system.

4. Timing and Implementation Planning

The speed of implementing new documentation requirements will command significant resources from government agencies and industry for compliance. Given only 20 million passports a year are issued by Canadian and U.S. Governments, there are considerable challenges to any one solution being feasible within the space of one to two years.

For More Information

The Tourism Industry plays an important role in advancing future solutions for credentialing and proof of citizenship.

We would be pleased to participate in consultations and would encourage that a session be included for the Pacific Northwest.

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