



February 15, 2022

Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue, NW  
Suite CC-5610 (Annex B)  
Washington, DC 20580

RE: Impersonation Advance Notice of Proposed Rulemaking (ANPR); FTC File No. R207000

The Exhibitions & Conferences Alliance (ECA) is pleased to submit this response to the Federal Trade Commission's (FTC) ANPR on Government and Business Impersonation Fraud. ECA is an alliance of eight professional and trade associations and five labor unions that comprises the unified voice of the face-to-face business events industry. ECA's alliance partners are:

- Center for Exhibition Industry Research
- Destinations International
- Exhibit Designers + Producers Association
- Exhibitions Services & Contractors Association
- International Association of Exhibitions and Events
- International Association of Venue Managers
- Society of Independent Show Organizers
- Trade Show Labor Alliance (International Alliance of Theatrical Stage Employees, International Brotherhood of Electrical Workers, International Brotherhood of Teamsters, International Union of Painters and Allied Trades, United Brotherhood of Carpenters)
- UFI

The face-to-face business events industry supports 6.6 million jobs nationwide and contributes \$396 billion annually to U.S. gross domestic product. Importantly, small businesses are the driving force behind face-to-face business events, including conventions and trade shows, with 99% of all face-to-face business event companies meeting the U.S. Small Business Administration's size standards for small businesses. In addition, face-to-face business events are growth engines for many other small businesses nationwide, across every major sector of the U.S. economy. Of the 1.7 million exhibitors at face-to-face business events each year, more than 80% are small businesses themselves.

Given the size and scope of the face-to-face business events industry, it is a frequent target of business impersonation fraud (BIF). ECA alliance partners themselves are targets of BIF, as are their members, attendees, and exhibitors, most of which are small businesses. Within the industry, the two most common BIF scams are hotel reservation scams and attendee list sale scams.

### **Hotel reservation scams**

Third-party hotel room brokers often use deceptive practices to market overpriced or nonexistent hotel rooms to exhibitors and attendees at face-to-face business events. These scammers email or call exhibitors and attendees, whose contact information is illegally harvested from convention and trade show websites, and fraudulently identify themselves as the official housing providers of a particular event. Claiming that hotel room blocks are “filling up fast” and “rooms may not be available unless booked and paid for right now,” these scams often ask victims to prepay the full amount of the proposed stay plus tax, rather than the one-day deposit typically required by legitimate housing bureaus. Rather than providing the hotel room promised, these fraudulent brokers often make off with the victim’s credit card information or provide victims with lower-quality rooms in more remote locations than the official hotels being offered by event organizers, usually with high booking fees and cancellation or change penalties attached.

### **Attendee list sale scams**

Similarly, face-to-face business events exhibitors are frequently contacted by rogue list brokers fraudulently claiming to have and sell the event’s attendee list before the event takes place. These scammers often use the event name, logo, and/or organizer’s name in their email signatures to create the illusion that their efforts are conducted with the approval of the event organizer. That said, the vast majority of event organizers do not sell their attendee registration list, nor do they authorize any third party to distribute or sell attendee lists or any list related to their events. Rather, these entities “crawl” event-related websites to harvest usable email addresses, which they subsequently target with phishing scams designed to illegally obtain an exhibitor’s business and financial information that can be used for fraudulent purposes. While such activities are illegal, it does not prevent scammers from frequently targeting the face-to-face business events industry’s small-business exhibitors

Unfortunately, BIF victims in the face-to-face business events industry have little recourse against scams perpetrated against them. Further, most of these digital fraudsters are impossible to track down, and the limited judgements against entities committing fraud are difficult to enforce. For example, in 2018 the U.S. Poultry & Egg Association (USPOULTRY) was awarded \$750,000 in damages resulting from the deceptive advertising practices of Tarzango LLC, a fake travel agency engaging in a hotel reservation scam affiliated with USPOULTRY’s International Production & Processing Expo. To date, none of the awarded damages has been paid out to USPOULTRY.

Given the breadth of BIF against perpetrated against face-to-face business events stakeholders, ECA strongly encourages the FTC to target bad actors impersonating ECA alliance partners and their members seeking to steal money and irreparably harm brands. This includes:

- Supporting a rule prohibiting the deceptive impersonation of a business or non-profit by a person or entity that lacks authority to act on behalf of that business or non-profit, based on the standards for deceptive conduct under the FTC Act. Federal Trade Commission

- Encouraging the FTC to increase education and outreach to consumers, small businesses, and other organizations with new resources tailored to the dangers of, and solutions to prevent against, BIF

In closing, the face-to-face business events industry is all too familiar with the impact of BIF. That's why ECA alliance partners, their members, and event exhibitors and attendees nationwide encourage the FTC to develop a rule that directly targets the perpetrators of BIF, which would provide another enforcement tool to target scammers. Additionally, ECA encourages the FTC to play a leadership role in the development and dissemination of consumer and business education resources in this space.

If you have any questions regarding the information contained within these comments, or if ECA can answer any question on this critical issue, please do not hesitate to contact Thomas F. (Tommy) Goodwin, ECA's Vice President, Government Affairs by phone at (703) 672-0780 or via email at [tommy.goodwin@ecalliance.us](mailto:tommy.goodwin@ecalliance.us). Thank you very much for your consideration.

Sincerely,



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Co-President



David DuBois, CMP, CAE, CTA, FASAE  
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