March X, 2023

Federal Trade Commission

600 Pennsylvania Avenue, NW

Washington, DC 20580

**Re: Trade Regulation Rule on Impersonation of Government and Businesses, R207000, Docket No. FTC-2022-0064**

To the Federal Trade Commission:

On the heels of National Consumer Protection Week, we write to you as a coalition of trade associations and other organizations in the face-to-face business events industry, urging you to proceed expeditiously to a final rule targeting government and business imposters.

It has been three months since comments were submitted in response to the Commission’s Notice of Proposed Rulemaking on Government and Business Impersonation Fraud (“NPRM”)[[1]](#footnote-1), and more than a year since the launch of the Advance Notice of Proposed Rulemaking (ANPRM) on this matter.[[2]](#footnote-2)

In that time, impersonation scams impacting non-profits, including trade shows have continued to increase. For example, the Consumer Technology Association® (CTA), which owns and produces CES®, has received at least a half dozen reports of impersonation scams using the CES logo, during and in the two months following this year’s show. These impersonation scams varied from the sale of false discounted badges to fraudulent websites offering hotel bookings for CES.

Similarly, Exhibitions & Conferences Alliance (ECA) members have experienced an uptick in event attendee list sale scams. These increasingly sophisticated impersonation scams use copyrighted event names, logos, and fake email signatures to create the illusion that the efforts of the scammers are conducted with the approval of the event organizers and service providers. Yet another trade association described receiving at least a dozen emails from different email addresses, purporting to sell registration lists in the lead up to an event in which they were participating as an exhibitor.

As the Commission noted in a recent blog post, impersonator scams were the most reported type of scam in 2022, with an estimated $2.6 billion in losses.[[3]](#footnote-3)[[4]](#footnote-4) Unlike many other forms of fraud that primarily target consumers, these impersonation scams have serious economic consequences for businesses, including non-profits. Notably, reported losses from scammers impersonating businesses grew nearly 50 percent compared to 2021.

We commend the Commission for its proposed rule targeting government and business imposters, and were pleased that the NPRM included non-profit organizations in the proposed definition of “business.” With millions of Americans expected to attend in-person conferences and events this year, continued impersonation scams such as those involving hotel bookings, the sale of attendee lists, and event space fraud, remain an on-going threat to the reputations of each of our organizations.

We implore the Commission to proceed to adopting a final rule as soon as possible.

Sincerely,

1. Trade Regulation Rule on Impersonation of Government and Businesses, 87 Fed. Reg. 62,741 (Oct. 17, 2022) (“NPRM”). [↑](#footnote-ref-1)
2. Trade Regulation Rule on Impersonation of Government and Businesses, Proposed Rule, 86 Fed. Reg. 72,901 (Dec. 23, 2021) (“ANPRM”). [↑](#footnote-ref-2)
3. *The top scams of 2022*, Federal Trade Commission, https://consumer.ftc.gov/consumer-alerts/2023/02/top-scams-2022. [↑](#footnote-ref-3)
4. *Id.* [↑](#footnote-ref-4)