



September 21, 2020

The Honorable Robert R. Redfield  
Director  
Centers for Disease Control and Prevention  
395 E Street SW  
Washington, DC 20024

RE: Docket No. CDC-2020-0087

Dear Director Redfield:

I am writing today in response to the above-captioned Request for Information (RFI) on behalf of the American Society of Travel Advisors (ASTA) and the 140,000 Americans who work at travel agencies across the country. In summary, ASTA urges the U.S. Centers for Disease Control and Prevention (CDC) to work with cruise lines, federal, state and local public health authorities and other cruise community stakeholders to support the safe resumption of cruise operations from U.S. ports.

Travel advisors – online, “brick and mortar” and many hybrid business models in between – play a critical role in the U.S. travel and tourism industry. Travel agencies are responsible for the sale of the majority of airline tickets in the U.S and are the primary distributors of cruises, representing 66 percent of the market.<sup>1</sup> At last count, there were close to 15,000 retail locations in the U.S., employing over 108,000 people, plus an additional 40,000 self-employed travel advisors.

Few sectors have been as hard hit by the coronavirus pandemic (COVID-19), or face a longer road to recovery, than the travel and tourism industry, and the suspension of cruise operations in the U.S. has been a key factor in the decimation of the travel agency sector in particular. ASTA member surveys conducted in August show that more than 9 in 10 travel agencies’ (94.3 percent) business income is down at least 75 percent compared to 2019. Further, even factoring in the relief programs created by the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136), close to 64 percent of travel agencies surveyed have laid off at least half their staff. All told, 73 percent of ASTA members predict they will be out of business in six months or less if current conditions hold and additional relief is not provided.<sup>2</sup>

While public health is paramount for our members, the CDC must not ignore the catastrophic economic consequences of its “No Sail Order” on travel agencies and cruise-connected businesses of all stripes. In normal times, the cruise industry is central to the financial health of the travel agency sector. According to the research firm PhocusWright, 60 percent of travel advisors nationwide specialize in selling ocean cruises. In 2019, travel agencies and advisors sold approximately \$13 billion worth of cruises in the U.S. – two-thirds

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<sup>1</sup> Phocuswright: [U.S. Travel Agency Distribution Landscape: 2016-2021](#).

<sup>2</sup> American Society of Travel Advisors. (2020, August 6). [Over Seventy Percent of Travel Agencies Will Be Out of Business in Six Months or Less Without Additional Federal Relief](#) [Press release].

of the market.<sup>3</sup> With the No Sail Order in place, all of this economic activity has come to a halt, with agency staff furloughs and terminations in its place.

While many of the questions in the RFI are related to cruise ship operations, below ASTA is weighing in on several specific questions for which the travel advisor perspective would provide some useful insight. Before we do so, we will take this opportunity to share our general thoughts and other relevant information with regard to the prompt resumption of cruising, especially as it compares with other modes of travel.

First is the centrality of mask-wearing as a means to prevent the spread of COVID-19. All the major air carriers now require the wearing of masks in-flight, and ASTA has called for a governmental mandate to that effect.<sup>4</sup> The Director of the CDC has recently gone so far as to state that widespread mask-wearing is more important to controlling COVID-19 than the availability of a vaccine: “These face masks are the most important, powerful public health tool we have. And I will continue to appeal for all Americans, all individuals in our country, to embrace these face coverings...I might even go so far as to say that this face mask is more guaranteed to protect me against COVID than when I take a COVID vaccine. Because the immunogenicity may be 70 percent, and if I don't get an immune response, the vaccine's not going to protect me. This face mask will.”<sup>5</sup>

It stands to reason, then, that the CDC should require mask-wearing on cruise ships where social distancing is not possible as part of lifting the No Sail Order, and that such lifting need not be dependent on a COVID-19 vaccine being widely available. Such a regime has been adopted in other venues where patrons gather in numbers, whether by government mandate or business policy, including on airplanes, in hotels, in malls, restaurants and more. We see no reason why it cannot be adapted to the cruise environment, and why the No Sail Order shouldn't be lifted.

With regard to the technical questions in the RFI, first and foremost ASTA would like to underscore that even before COVID-19, cruise lines have a long history of successfully protecting the public health and safety of passengers and crew onboard and the communities they visit. From cleaning practices to passenger screening and robust adherence to onboard health and safety practices, the cruise industry is one of the most vigilant as it relates to the maintenance of safety, sanitation, and public health protocols. We are confident that this longstanding commitment to public health will continue as cruising resumes.

*10. How should cruise ship operators address specific country travel restrictions that emerge as COVID-19 activity increases in geographical areas, such as:*

- a. border closures preventing passengers and crew from repatriating?*
- b. seaport closures preventing porting of ships?*
- c. embarking passengers originating from countries with heightened COVID-19 activity?*

ASTA's members recognize that national governments around the world have implemented travel restrictions that limit travel by citizens of countries with heightened COVID-19 activity, and this would not just affect cruise travelers. Our members that specialize in cruise travel regularly check travel advisories

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<sup>3</sup> Op. cit.

<sup>4</sup> American Society of Travel Advisors. (2020, July 31). For Americans to Return to the Skies, It's Time for an FAA Mask Mandate [Press release]. Retrieved from <https://www.asta.org/About/PressReleaseDetail.cfm?ItemNumber=30409&navItemNumber=539>.

<sup>5</sup> O'Kane, Caitlin. “CDC director says face masks may offer more protection against COVID than a vaccine.” CBS News. 2020, September 18. Retrieved from <https://www.cbsnews.com/news/covid-face-mask-protection-vaccine-cdc-director/>

with respect to COVID-19 and other issues and communicate those to their clients. Moreover, as we understand it travel restrictions and pre-embarkation requirements for cruise passenger customers are routinely communicated to passengers by our members, and the cruise industry has effectively managed country-specific travel restrictions for many years.

17. Should cruise ship operators plan to reduce passenger and crew loads to decrease the risk of transmission on board the ship?

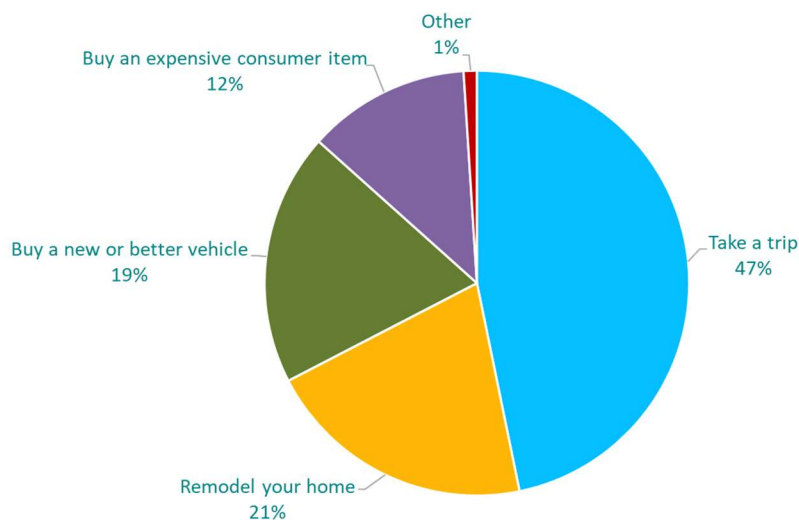
b. To what extent might reducing passenger capacity affect the economic viability of cruise lines?

Unlike other forms of travel, cruise ships are designed in a way that supports social distancing. Cruise ships are generally spacious and can include multi-level dining rooms, promenades, outdoor decks, and numerous different lounges and venues that naturally foster social distancing. We recognize that reducing passenger and crew loads may be a simple means of decreasing COVID-19 transmission risk onboard, and appreciate that these efforts may be necessary to support the health and safety of passengers and crew. However, we are hopeful that such measures would only be implemented on a temporary basis. That is because limiting cruise ship capacity reduces the amount of staterooms available for sale by our members, which in turn will have negative economic implications for their businesses.

Twice monthly, ASTA and its research partners measure consumer sentiment, behaviors, attitudes and perceptions through an online survey with a representative sample of the U.S. population, which includes insights that may be helpful to the CDC as it works toward lifting the No Sail Order.<sup>6</sup> In our research, respondents are sourced from aggregated third party panel sources with quotas set for gender, geographic representation and age distribution. Findings are projectable with a margin of error of +/- 4.08 percent at a 95 percent confidence interval. Also included are in-depth one-on-one interviews with a random sample of currently employed Americans. Several key consumer sentiments related to travel, and cruising in particular, include the following:

1. Consumers are ready to travel. When asked what large discretionary purchase they would make if the pandemic suddenly ended, 47 percent of respondents stated they would take a trip.

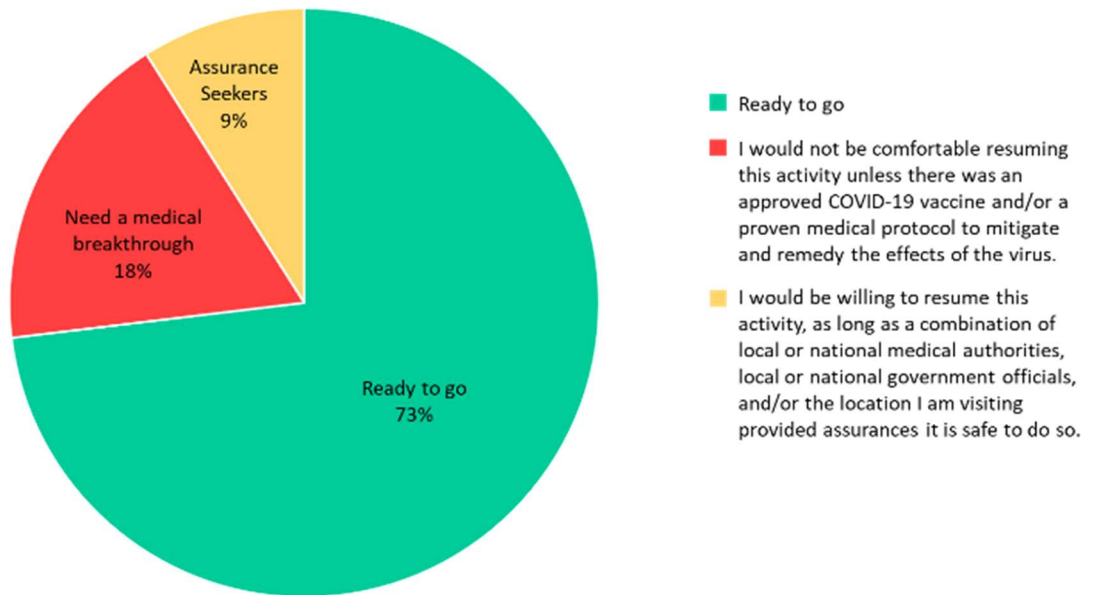
If the pandemic suddenly ended tomorrow, what one large discretionary purchase would you make?



<sup>6</sup> Sports & Leisure Research Group et al. (2020, September 9). *WAVE 11: Emerging from their shells - Public opinion insights from the Sept. 9, 2020 "Back-to-Normal Barometer."* <https://engagious.com/backtonormalbarometer>

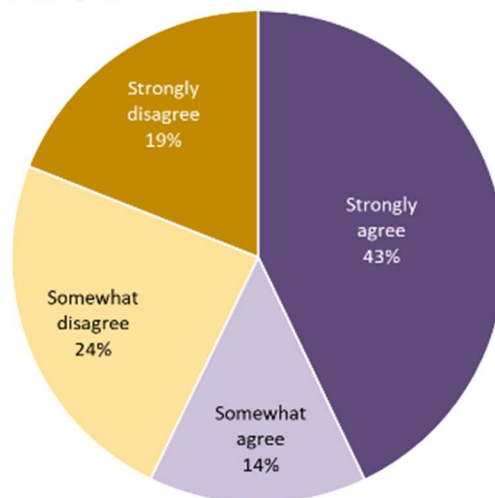
2. 73 percent of those who have taken cruises in the past are ready to take a cruise vacation **now**.

Which of the following conditions is closest to your current point of view... Take a cruise vacation



3. Also, among past cruisers who are either assurance seekers or awaiting a medical breakthrough, the majority indicate that testing is critical. Specifically, 57 percent agreed that a low-cost nasal-swab rapid test allowing cruise lines to deny boarding to anyone testing positive on the spot would make them likelier to take a cruise.

[Among past-year cruisers who are assurance seekers and breakthroughs:] Once sailings become available, I'd be much likelier to take a cruise if a low-cost, nasal-swab rapid test allowed cruise lines to deny boarding to anyone who tested positive for COVID-19 on the spot.



Thank you, on behalf of our 15,000-strong membership, for considering ASTA's views on these critical issues. At ASTA, we are committed to working toward a travel industry restart with federal, state and international governments, our members, and the broader travel ecosystem in a way that puts the safety and health of U.S. citizens at its center. With regard to this RFI, as noted, most if not all of the questions posed are related to cruise ship operations, technical in nature and best suited to being resolved by the cruise lines

themselves in cooperation with public health professionals. With confidence in both parties, we ask simply that this process be completed as quickly as possible, and the No Sail Order lifted as soon as is practicable thereafter.

Taken together with additional financial relief that we hope will soon be provided to travel businesses by the U.S Congress, and the private sector doing its part, we believe a safe and swift resumption of cruising will help instill consumer confidence and get America's economy, and its intrepid travelers, moving again.

If you or your staff has any questions about this or any related to the travel industry, don't hesitate to contact me or Eben Peck, ASTA's Executive Vice President of Advocacy, at (703) 739-6842 or [epeck@asta.org](mailto:epeck@asta.org).

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Zane Kerby". The signature is fluid and cursive, with the first name "Zane" and last name "Kerby" clearly distinguishable.

Zane Kerby  
President & Chief Executive Officer