



July 3, 2025

Senate Committee on Consumer Protection & Professional Licensure  
North Office Building  
Senate of Pennsylvania  
Harrisburg, PA 17120

Re: Pennsylvania House Bill 1216 – Oppose Unless Amended

Dear Chair Stefano, Minority Chair Boscola, and Members of the Senate Committee on Consumer Protection & Professional Licensure:

On behalf of the Travel Technology Association (Travel Tech) and our members, I thank you for the opportunity to submit the following comments concerning HB1216, which clarifies and expands the scope of consumer price transparency requirements under the Unfair Trade Practices and Consumer Protection Law. Travel Tech and our members support efforts to ensure price transparency for all consumers. For the reasons cited below, however, we respectfully request that HB1216 be amended to align with recently adopted federal regulations that establish a clear, consistent, nationwide standard.

Travel Tech represents the leading innovators in travel technology, including online travel agencies (OTAs), metasearch companies, travel management companies, and short-term rental platforms. Our members' vital role in the travel and tourism industry empowers consumers, creates a fair and competitive marketplace, fosters accountability, and promotes positive customer experiences.

Promoting transparency is a top priority for Travel Tech and its members. It is essential that travelers make informed decisions without hidden fees or unexpected expenses. When travelers have complete pricing details, they can accurately compare different options and make choices that align with their preferences and budget. This transparency enables travelers to plan more effectively and promotes fair marketplace competition.

In January, the Federal Trade Commission issued a final rule in a bipartisan vote to address price transparency in the accommodations and live events industries. This final rule went into effect on May 12, 2025. It defines "total price" as "the maximum total of all fees or charges a consumer must pay for any good[s] or service[s] and any mandatory ancillary good or service, except that government charges, shipping charges, and fees or charges for any optional ancillary good or service may be excluded."<sup>1</sup> The final rule requires that businesses disclose the Total Price up front when advertising any price and display it more prominently than other price information. Before receiving customer payments, businesses must also disclose the purpose of all charges and the final amount of payment. Importantly, the FTC rule empowers state attorneys general to enforce its provisions, ensuring effective enforcement across the country and in Pennsylvania.

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<sup>1</sup> **Federal Trade Commission. (2024).** *Trade Regulation Rule on Unfair or Deceptive Fees*. 16 CFR Part 464. Federal Register, 89(21216). [Retrieved from Federal Register](#)



Since the accommodations industry must comply with the FTC's final rule on price transparency, we respectfully ask that HB1216 be amended to provide that an accommodations booking platform, homestay platform, hotel platform, lodging platform, or ticket platform that complies with the FTC rule shall be deemed compliant with Section XXI if HB1216 becomes law. To do so, the following text should be added to HB1216:

"Offers or advertisements for short-term lodging, including temporary sleeping accommodations at a hotel, motel, inn, short-term rental, vacation rental, or other place of lodging that are in compliance with part 464 of chapter I of title 16 of the Code of Federal Regulations shall be deemed in compliance with this section."

In light of our concerns, we must oppose HB1216 unless it is amended. With pricing display resolved at the federal level, introducing state-specific requirements risks creating conflicting standards that could complicate compliance and undermine consumer clarity. We respectfully request that you defer to the established federal standard to ensure a streamlined, effective approach to price transparency that is consistent no matter where a consumer or lodging supplier is located.

Thank you for your careful consideration of this matter.

Sincerely,

A handwritten signature in black ink that reads "Laura Chadwick".

Laura Chadwick  
President & CEO  
The Travel Technology Association  
[www.traveltech.org](http://www.traveltech.org)

CC:  
The Honorable Elizabeth Fiedler