



January 27, 2026

The Honorable Stella G. Pekarsky
Senate of Virginia
General Assembly Building, Room 621
P.O. Box 396
Richmond, VA 23218

Re: Senate Bill 615 – Oppose Unless Amended

Dear Senator Pekarsky:

On behalf of the Travel Technology Association (Travel Tech) and our members, we submit the following comments on Senate Bill 615, relating to online device pricing under the Virginia Consumer Data Protection Act.

Travel Tech represents the leading innovators in travel technology, including online travel agencies (OTAs), metasearch engines, short-term rental platforms, Global Distribution Systems, Travel Management Companies, and early-stage travel tech start-ups. Our members play a critical role in supporting Virginia's travel and tourism economy by empowering consumers with choice and transparency, promoting fair competition, and enabling efficient, technology-driven marketplaces.

Travel Tech must oppose SB 615 since it would eliminate well-established, pro-consumer pricing practices that lower costs and expand traveler choice. Location-based or app-based pricing are transparent, widely available incentives used to manage perishable travel and hospitality inventory and compete for consumers' business—not individualized pricing based on a consumer's sensitive personal data. The consequences of SB 615 and other similar bills will be fewer last-minute and off-peak deals, reduced competition, and higher costs for travelers. Policymakers should instead focus on addressing actual harms that result from the misuse of sensitive data, not broadly prohibiting common pricing practices that support competition, transparency, and affordability in the travel marketplace.

If the committee determines it must move forward with this bill, the exemption for discounting should be amended. While proposed § 59.1-577.2(B)(3) seeks to preserve legitimate coupons, discounts, and promotions offered to the general public, the final clause—requiring that such discounts “not incorporate input data as specified in subsection A”—effectively nullifies that safeguard. In practice, many common discounts rely on basic device or application signals for eligibility, delivery, or fraud prevention purposes, even when the discount itself is uniform and not based on individualized pricing or discriminatory profiling. As a result, the current language risks prohibiting precisely the types of bona fide consumer discounts the carve-out appears designed to protect.

To address this concern, Travel Tech respectfully requests a narrow, technical amendment to SB 615:



Strike the final clause of § 59.1-577.2(B)(3) (“and does not incorporate input data as specified in subsection A”).

This change avoids unintended consequences for legitimate, pro-consumer discounts that are broadly available and transparently offered.

We appreciate your consideration of our proposed amendment and look forward to working with you to ensure Virginians have continued access to the best available pricing for travel services.

Thank you for your time and attention.

Sincerely,

Laura Chadwick
President & CEO
The Travel Technology Association
www.traveltech.org