



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive
Public Works Resource

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December 14, 2022

April Tabor
Secretary of the Commission
Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580

RE: Trade Regulation Rule on Impersonation of Government and Businesses, Impersonation NPRM; FTC File No. R20700

Dear Secretary Tabor,

As CEO and President of the not-for-profit American Public Works Association (APWA), we jointly write in support of the FTC's proposed adoption of its trade regulation titled *Rule on Impersonation of Government and Businesses* and respectfully request that the proposed rule be published as a final rule.

As a member-based association, conferences and events comprise a significant part of APWA's calendar year. Indeed, they are an integral part of the value members receive from their membership in APWA, allowing them to network, hear from experts in their fields, and improve their own careers. Unfortunately, the sphere of producing events remains one rife with scam and impersonation. APWA's own meetings department has estimated that for each conference or show cycle, there are dozens of attempts at impersonation or outright scam. This manifests itself in the form of attempts to sell APWA's event attendee lists, which scammers do not have access to, or attempts by 'housing companies' appearing to represent APWA's events and solicit hotel reservations away from APWA's blocks that we are contractually obligated to fill. Scammers and impersonators also attempt to divert revenue away from the official housing service providers. Further, this activity is not only directed at APWA's staff, but also APWA's members and extends to conference and event participants. The strong public interest in this subject, and its importance, is evident by the number of submissions the FTC has received in response to the Advanced Notice of Proposed Rulemaking.

As a not-for-profit entity, APWA is particularly supportive of § 461.1 of the proposed rule, which defines "business" to include non-profit organizations. As the [October 17 comment request](#) published in the Federal Register details in its supplementary information category, scammers exact a significant toll on both profit and not-for-profit entities alike. In support of the inclusion of non-profits in a potential final rule, and to demonstrate that they are just as affected as for-profit entities, the National Association of State Charities (NASCO) noted that FTC worked with 38 state charity regulators to thwart a telemarketing scam that involved over 100 million donations. The expansion of remedies to pursue impersonation and scams likewise ensures that there is a greater chance to reduce these incidents in the first place.

PRESIDENT
B. Keith Pugh, P.E., PWLF

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE



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As the world emerges from the COVID-19 pandemic, there will be an even greater priority placed on conferences and other in-person events. Indisputably, they will be vital to the continued success of APWA, as well as countless other organizations, enhancing the membership experience, encouraging economic activity, and creating a more connected society for all. APWA appreciates the opportunity to comment. If APWA may be of further assistance, please contact Andrea Eales, Director of Government & Public Affairs, at aeales@apwa.net, or at (202)-218-6730.

Sincerely,

A handwritten signature in dark ink, reading "Scott D. Grayson". The signature is fluid and cursive, with a long horizontal line extending from the end.

Scott D. Grayson, CAE
Chief Executive Officer

A handwritten signature in dark ink, reading "B. Keith Pugh". The signature is bold and stylized, with the letters "B", "K", and "P" being particularly prominent.

Keith Pugh, PE, PWLF
APWA President

PRESIDENT
B. Keith Pugh, P.E., PWLF

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE