



September 4, 2026

VIA EMAIL

Chris Mufarrige, Director
Brian Shull, Acting Associate Director
Bureau of Consumer Protection
Federal Trade Commission
cmufarrige@ftc.gov
bshull@ftc.gov

Re: Widespread Deceptive Marketing by Passport Couriers Registered with the U.S.
Department of State

Dear Mr. Mufarrige and Mr. Shull:

Truth in Advertising, Inc. ("TINA.org") writes to notify the Federal Trade Commission of a pattern of deceptive marketing by companies registered as passport couriers with the U.S. Department of State. The Commission has previously recognized significant consumer-protection concerns with private passport services going so far as to warn consumers in July 2024 that online searches for passport assistance may lead to private websites that create a misleading impression of government affiliation and falsely suggest that consumers can obtain passports more quickly through private courier services than they can on their own directly through the State Department, among other issues.¹ A recent TINA.org investigation builds upon these concerns documenting their prevalence among companies formally registered as passport couriers with the Department of State and demonstrating the need for greater scrutiny within the industry.

As detailed in the attached comment, which TINA.org submitted to the Department of State in connection with its supplemental notice of proposed rulemaking establishing registration requirements and conduct standards for passport couriers (RIN 1400-AE37; Docket No. DOS-2025-0170), TINA.org's investigation documents pervasive and material misrepresentations by registered couriers, including:

- False or misleading claims that these companies are affiliated with, endorsed by, or otherwise part of the federal government.
- False or misleading claims about the speed with which these companies can obtain or "expedite" passports.

- Deceptive pricing practices that omit or obscure mandatory government fees and other charges from advertised prices.
- Misleading marketing obscuring commercial partnerships between major brands and passport couriers, among other issues.

TINA.org's investigation makes clear that the vast majority of active couriers registered with the Department of State have engaged in one or more of these practices, which cause significant consumer harm, including financial losses, missed or canceled travel plans, and emotional distress – particularly among consumers facing urgent travel needs. The scale of this harm is borne out in the Commission's own records. Among a sampling of just 10 registered couriers – fewer than 5% of those registered with the Department of State – the FTC has cumulatively received more than 3,700 consumer complaints in recent years.² The attached comment documents a sampling of representative complaints drawn from TINA.org's own intake, third-party review platforms and FTC submissions.

Although the Department of State registers passport courier companies, it does not enforce consumer protection or truth-in-advertising laws. The Commission's authority under Section 5 of the FTC Act to prohibit unfair or deceptive acts or practices is well-suited to address the conduct at issue.³ TINA.org respectfully requests that the Commission review the attached comment, as well as a sampling of the underlying evidence, which is available at www.truthinadvertising.org/evidence/registered-passport-courier-marketing-database,⁴ and take appropriate investigative or enforcement action.

Respectfully submitted,



Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.



Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

Attachment

¹ FTC, *Avoid scam websites that offer to help you get or renew your passport* (July 3, 2024), <https://consumer.ftc.gov/consumer-alerts/2024/07/avoid-scam-websites-offer-help-you-get-or-renew-your-passport>.

² TINA.org obtained this information from the FTC through various Freedom of Information Act requests. Of note, in May 2026, TINA.org also requested from the FTC the total number of consumer complaints it has received across all passport couriers registered with the Department of State but, to date, has not obtained this information.

³ The FTC's Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity, may also be implicated.

⁴ TINA.org is notifying each company listed in this database of our investigation findings.