August 24, 2022

Jorge Bannister  
Department of Business Regulation  
1511 Pontiac Avenue, Bldg 69-1 Cranston, RI 02920  
DBR.REInquiry@dbr.ri.gov

RE: Comments on Proposed Short-Term Rental Property Registration Rule: 230-RICR-30-20-4

Dear Mr. Bannister:

The Rhode Island Association of REALTORS® (RIAR) submits the following comments on the proposed short-term rental regulations.

RIAR shares the concerns of other commenters about this impact of a rental registration law but recognizes that the Department of Business Regulation (DBR) is legally required to adopt a registration requirement as a result of legislation enacted by the Rhode Island General Assembly.

RIAR recommends that DBR:

• replace “operates” with “owns” in proposed 4.41 (b).

• clarify in the proposed regulations and in any guidance about the regulations that the registration requirement applies only to the owner of the property and not to a property manager, rental agent, or other third party.

• define “property manager” and clarify that the name of a rental agent who simply places a tenant in a short-term rental need not be listed on the registration form.

• clarify that a hosting platform does not include a web site that is operated by a property manager, rental agent or property owner.

• allow registration and payment of registration fees to take place electronically.

• clarify, which of the required information, such as the owner’s phone number, may be kept private.

• clarify the conflict between R.I.G.L. § 42-63.1-14(b), which defines a short-term rental as “a person, firm, or corporation’s utilization, for transient lodging accommodations, not to exceed thirty (30) nights at a time” [emphasis added] and § 42-63.1-2, which defines “occupancy” to exclude rentals of more than 30 consecutive days.

Thank you for your consideration.

Sincerely,

Philip B. Tedesco  
CEO