

From: [chris sands](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] :
Date: Tuesday, August 16, 2022 7:40:24 AM

Hello,

Please explain what benefits are gained through registering an Air BnB other than a \$50 money grab. The DBR was established to help businesses in RI yet we are 48/50 because of our over taxed and unfriendly mentality.

Thank You

From: [Brandon Pico](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Fwd: Short-Term Rentals Proposed Regulation – Comment Period Ends August 27t
Date: Friday, July 29, 2022 7:15:38 AM

4.41

B Registrations will be issued for each property. If a person or entity operates multiple short-term rental properties, **each individual property** must be separately registered with the Department.

Should the wording be each individual listing?

If someone has a two-family property, and are renting both units, I would assume **each unit** would need its own registration.

Yet, the property address could just be listed as 20-22 Mainstreet, yet still be two separate dwelling units.

Also. Do you have a copy / rough draft of what the registration would look like?

And, will hosts need to be first registered with their own municipalities first?

Will the State's registration have built into it's code each municipalities' zoning ordinances?

OR, does this supersede municipalities due to the fact this was 'forced' on the state by a very specific municipality?

Thank you.

Begin forwarded message:

From: "REInquiry, DBR (DBR)" <DBR.REInquiry@dbr.ri.gov>
Subject: Short-Term Rentals Proposed Regulation – Comment Period Ends August 27t
Date: July 28, 2022 at 10:31:43 AM EDT
Cc: "Stewart, Amy (DBR)" <Amy.Stewart@dbr.ri.gov>, "Defedele, Donald (DBR)" <Donald.Defedele@dbr.ri.gov>, "DeLuca, William (DBR)" <William.DeLuca@dbr.ri.gov>, "Dwyer, Elizabeth (DBR)" <Elizabeth.Dwyer@dbr.ri.gov>

Hello,

Please be advised that the Department of Business Regulation has proposed to adopt a new regulation entitled, Short-Term Rental Property Registration, [230-RICR-30-20-4](#).

Written comments on the proposed adoption should be submitted no later than

August 27, 2022, by clicking on the “Comments” tab on the [Secretary of State’s Website](#) or by email to DBR.REInquiry@dbr.ri.gov.

The proposed regulation and notice of proposed rulemaking can be accessed by the links in this email.

Thank you,

**Rhode Island Department of Business Regulation
Commercial Licensing Division
Real Estate Section**

From: [Chauncy Gray](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Re: Short-Term Rentals Proposed Regulation – Comment Period Ends August 27t
Date: Thursday, July 28, 2022 7:05:11 PM

Hello,

Thank-you for the update. When will this be approved?

Very Respectfully,

Chauncy Gray
cgmid2009@yahoo.com

On Jul 28, 2022, at 10:31, REInquiry, DBR (DBR)
<DBR.REInquiry@dbr.ri.gov> wrote:

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Thank you,

Rhode Island Department of Business Regulation
Commercial Licensing Division
Real Estate Section

From: [Dan Fanciullacci](#)
To: [REInquiry, DBR \(DBR\)](#)
Cc: [Stewart, Amy \(DBR\)](#); [Defedele, Donald \(DBR\)](#); [DeLuca, William \(DBR\)](#); [Dwyer, Elizabeth \(DBR\)](#)
Subject: [EXTERNAL] : RE: Short-Term Rentals Proposed Regulation – Comment Period Ends August 27t
Date: Thursday, July 28, 2022 1:32:10 PM

Good Afternoon,

I hope this finds you doing well and appreciate the outreach.

Avenu offers a Full Service Short-Term Rental Solution and Service, which includes an online permitting portal.

Do you have a solution in place for online permitting, is this something that I can help with?

Along with online permitting, our solution / offering also includes:

- **Tax Collection & Remittance** - Receive, post and reconcile all STR filings and fee payments.
- **Discovery & Recovery** - Recover funds from newly discovered STRs and bring into compliance.
- **Community Outreach** - Communicate w/ noncompliant STRs and bring into compliance.
- **Compliance Auditing (% of Properties)** - On-site examinations by searching for financial or management inaccuracies, inadvertent irregularities, or potential fraudulent reporting practices.

Dan

DAN FANCIULLACCI
BUSINESS DEVELOPMENT EXECUTIVE

Avenu Insights & Analytics
5860 Trinity Parkway, Suite 120
Centreville, VA 20120

Mobile: 571.246.2713

Dan.Fanciullacci@avenuinsights.com

www.avenuinsights.com [[na01.safelinks.protection.outlook.com](#)]

From: REInquiry, DBR (DBR) <DBR.REInquiry@dbr.ri.gov>
Sent: Thursday, July 28, 2022 10:32 AM
Cc: Stewart, Amy (DBR) <Amy.Stewart@dbr.ri.gov>; Defedele, Donald (DBR) <Donald.Defedele@dbr.ri.gov>; DeLuca, William (DBR) <William.DeLuca@dbr.ri.gov>; Dwyer, Elizabeth (DBR) <Elizabeth.Dwyer@dbr.ri.gov>
Subject: Short-Term Rentals Proposed Regulation – Comment Period Ends August 27t

CAUTION: This email originated from an **External Source**. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Hello,

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Thank you,

Rhode Island Department of Business Regulation
Commercial Licensing Division
Real Estate Section

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From: [Cifu, Despina](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Short term rental registration
Date: Monday, August 29, 2022 8:08:46 AM

Good morning- How do I register? Thank you

The security, delivery, and timeliness of delivery of electronic mail sent over the Internet is not guaranteed. Most electronic mail is not secured. Do not send us confidential information like social security numbers, account numbers, or driver's license numbers by electronic mail.

The information transmitted is intended solely for the individual or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, re-transmission, dissemination, or other use of or taking action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you have received this e-mail in error, please contact the sender and delete the material from the computer.

From: [Henry Sean](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Short term rental registration
Date: Wednesday, August 3, 2022 10:42:11 AM

Good morning,

I'd like to ask about the registration information that will be required of the rental sites to be sent to DBR, and how DBR will be sharing that information with the municipalities. As well as if the registration launch is still scheduled for October 1. I can be contacted at this email address or at the phone number below. Please also add me to the interested parties list.

Thank you,

Sean Henry
Principal Planner & Special Projects Coordinator
City of Warwick
401-921-9568



From: [Cifu, Despina](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Short term rental registration
Date: Monday, August 29, 2022 8:08:46 AM

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From: [Suzan Amoruso](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Short term rentals registration
Date: Friday, August 12, 2022 11:34:20 PM

I feel the statewide registration of short term rentals should be done. The fee charged for this registration should be sufficient to cover any and all costs incurred by the program. Short term rentals are a very lucrative business/ investment vehicle. I feel they do not belong in residential areas, they should pay taxes to the state as do hotels. They need statewide safety standards as do hotels and motels. I believe the reference number for this is 230-RICR-30-20-4. Thank you. Suzan Amoruso, Narragansett

[Sent from Yahoo Mail on Android \[go.onelink.me\]](#)

From: [Rhodie Rideshare Guy Gerry](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] :
Date: Thursday, July 28, 2022 10:48:33 AM

To whom it may concern,

My name is Gerald Galleshaw I have been a A superhost with airbnb for 7 years.. I also advertise on [booking.com](#) [[booking.com](#)] in VRBO. I have previously reached out to offer input From The host perspective as well as to Give insight on Navigating some of the internal Workings of the sites.

I believe I could be very instrumental in answering some of the day-to-day operation questions that may arise during drafting Of your new ordinance. So again I would like to Volunteer by time To help get this done.

Please feel free to reach out to me6 at at 401.255.5575

Thank you again for your time and consideration.

Gerald Galleshaw



August 24, 2022

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

Sent via email and comment tab

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.

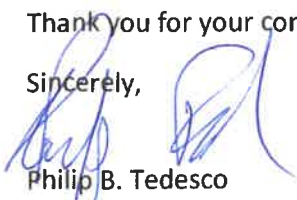
RIAR shares the concerns of other commenters about this impact of a rental registration law but recognizes that the Department of Business Regulation (DBR) is legally required to adopt a registration requirement as a result of legislation enacted by the Rhode Island General Assembly.

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

From: [DirOfficeInq, DBR \(DBR\)](#)
To: [Bannister, Jorge \(DBR\)](#); [Defedele, Donald \(DBR\)](#)
Subject: FW: [EXTERNAL] : Airbnb registration
Date: Tuesday, August 2, 2022 8:09:07 AM

Forwarding email below. Thank you!

-----Original Message-----

From: Amber Bybee <byarose@gmail.com>
Sent: Monday, August 1, 2022 6:22 PM
To: DirOfficeInq, DBR (DBR) <DBR.DirOfficeInq@dbr.ri.gov>
Subject: [EXTERNAL] : Airbnb registration

Hello,

I hope this note finds you well.

I have a question on how to register an Airbnb / VRBO listing with the state and the process involved. I believe I saw an ordinance pass that would require this.

I also would like to know who to contact at the state level if our town is not following their own ordinances regarding airbnb and is not following the state law regarding Airbnb/Vrbo listings. We are trying to do the right processes and respect systems but our town is not working with us and after 6+ months trying to get answers has left us going in circles / being passed from one department to another with no definitive answers or direction. We need some guidance.

Thanks!

Blessings,

Amber Ruehrwein
Byarose@gmail.com

Sent from my iPhone

From: [M. Enderby](#)
To: [REInquiry, DBR \(DBR\)](#)
Subject: [EXTERNAL] : Short-term rentals
Date: Wednesday, August 3, 2022 7:46:46 AM

Does this bill mean that the RI beachouse we rent every year will have yet another fee? Sales tax was added a few years ago which came to well over \$100. That meant we stayed at the beachouse instead of dining out at a local restaurant. Now you are squeezing us for more. I just cannot believe this state. You want every penny we have.
Margaret Enderby
Warwick, RI

From: Robin Foote <robin.raf@gmail.com>

Sent: Saturday, July 30, 2022 11:30 AM

To: REInquiry, DBR (DBR) <DBR.REInquiry@dbr.ri.gov>

Cc: Bookkeeper Seabreeze Property Management <bkpr.spm@gmail.com>; Maryann Foote <mary.anniebonnie@gmail.com>

Subject: [EXTERNAL] : Status of Existing Short Term Rental Business Already Paying Taxes

Dear Ms. Elizabeth Dwyer
Director, RI Department of
Business Regulation

We have owned several properties in Narragansett, RI beginning in 2004 and have been registered as a business as Seabreeze Property Management, LLC and SPMI HOLDINGS, LLC. We have diligently been paying both the 7% sales tax as well as 1% hotel tax to the state since the Governor passed the required legislation several years ago. In addition, we have paid state income tax for these businesses since their establishment and registration with the DBR.

I would like to know if we are now having to pay the additionally proposed \$50 Short-Term Rental Property Registration, [230-RICR-30-20-4](#). I feel it is unfair, unnecessary and additionally burdensome for property owners like us who have effectively been already registered and paying multiple state taxes on short-term rentals for many, many years. In addition, each town has its own rental registration fees.

I look forward to hearing back from you regarding this matter and whether, as existing, tax-paying businesses, we will be required to again register which, like the significant confusion that occurred over separate sales vs hotel tax payments and collection, could occur again.

Sincerely,

Robin Foote, General Partner
Seabreeze Property Management, LLC
SPMI HOLDINGS, LLC
143 Hamilton Ave.
Jamestown, RI
401-741-1678