From: ashipley1030@gmail.com
To: REInquiry, DBR (DBR)
Subject: Short term rental registration
Date: Friday, October 11, 2024 11:31:44 AM

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It is a real nuisance to do this every year. The registration should be for 2 years.

Sent via the Samsung Galaxy A14 5G, an AT&T 5G smartphone

From: hdicapua
To: REInquiry, DBR (DBR)
Subject: New short term rental guidelines
Date: Friday, October 11, 2024 5:43:36 PM

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I think it should be two years.

From: Richard Phipps
To: REInquiry, DBR (DBR)
Subject: Re: RI Short-Term Rental Regulation – Proposed Amendments
Date: Saturday, October 12, 2024 12:18:07 AM

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Dear Sir/Madam,

I am a real estate Broker and I believe that keeping the fee for registration at $50 and allowing a two year permit period could be more advantageous since it seems as though administration and or management of the program would require less activity or less oversight and since this process usually involve private citizens and their residence and is basically policed by the general public through their remarks, offers a sense of self regulation. If the matter of taxation is considered and third parties report on revenue gains from use of the unit on an annual basis, tax payers inclined to be honest, would add income to their return with the legitimate expenses and those taxpayers included to be dishonest to continue their practices and the revenue cost to the City may not be large enough to justify the labor cost to track those allegedly filing fraudulent returns for routine periodic audits would identify those individuals sooner or later.

Based on research completed, there are about 5,010 active short term rentals in Rhode Island. There are approximately 250,000 single family units. Many multi-family units are currently housing more than their capacity and therefore have little or no opportunity or likelihood to accommodate paid guests.

It is likely that the trend in short term rentals will continue to increase based on increasing cost of public accommodations such as hotels and other facilities. And it's my hope that to the extent possible, the City will not make this process burdensome because it helps the homeowners to met their obligations in these trialsome financials times and traveler st be able to benefit from modicum of reasonableness among their peers for those who are unable to afford the exorbitant price of current hotel accommodations.

On Fri, Oct 11, 2024 at 11:44 PM REInquiry, DBR (DBR) <DBR.REInquiry@dbr.ri.gov> wrote:

> The Department of Business Regulation has proposed amendments to its regulation entitled Short-Term Rental Property Registration, 230-RICR-30-20-4. The Proposed Amendments and Notice of Proposed Rulemaking, including a summary of the proposed changes, may be found under the “Rulemaking Documents” tab after clicking on this website: https://rules.sos.ri.gov/Promulgations/part/230-30-20-4.
>
> The Department is accepting written comments on the proposed amendments through

November 10, 2024. Please send your comments to Donald DeFedele at DBR.REInquiry@dbr.ri.gov.

A public hearing will be held remotely via Teams on Wednesday, October 23, 2024, at 10am. You can join the hearing here: https://bit.ly/STR-RegHearing [bit.ly]. [Teams Meeting ID: 264 577 254 529 and Passcode: EZBYmq]

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A force for stable, healthy communities
Richard C. Phipps, CFS Group CEO
TV Host, Real Estate, Finance and Taxes
1539 Blue Hill Avenue
Boston, MA 02126
p: (617) 296-7730, f: (617) 855-6001

From: rebecca turrell
To: REInquiry, DBR (DBR)
Subject: Comment for 230-RICR-30-20-4
Date: Friday, October 11, 2024 11:52:05 AM

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Hi after looking through the proposed changes, it to put additional burden on the owner to renew more frequently. I fail to see the benefit to the state, as the revenue will be the same however there will be more administrative working to follow up with owners annually instead of bi-annually. I feel there are more important things that the state can focus on that would actually have a positive impact on the residents.

From: Brian Crawford
To: REInquiry, DBR (DBR)
Subject: Regarding changes to Short-Term Rental Property Registration, 230-RICR-30-20-4
Date: Monday, October 14, 2024 11:51:34 AM

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Dear Donald DeFedele,

I have read the proposed changes to the regulation and have only one concern or question for you. Why are you reducing the registration renewal to yearly as opposed to every two years? Does this not increase paperwork for both the registrant and the Department by doubling the amount of times one must register and number of times the Department has to issue registrations. What is the justification for doing this? Now I will have to write two checks (or make two online financial transactions) every two years instead of one, and go in and change information on the third party hosting sites and make changes every year instead of every other year. I appreciate the fact that the fee per year is staying the same, but think for efficiency, **leave the registration valid for two years**. Why make more work for everybody? The regulation still requires a person to terminate the registration if no longer used as a short term rental or if the information changes (i.e. number of rooms for rent). Car inspections are twice yearly and so are registrations for cars, so why this change for short term rentals. Unless there is some reasonable justification, you are just making things more bureaucratic rather than trying to reduce paperwork and increase efficiencies. RI has a reputation for being overly bureaucratic for businesses and this seems to be an example of that.

Not to mention, most towns now also require short term rentals to be registered and pay a fee for registration, increasing costs of doing business in the state and adding more paperwork requirements. I suggest you may want to allow data on state registrations to be shared with towns if that is not being done, as that is one rationale some towns are stating for requiring a town registration as well as a way to cross check if short term rentals are also complying with town registration requirements.

For your consideration.

Sincerely,

Brian Crawford

Wakefield RI

From: drake patten
To: REInquiry, DBR (DBR)
Subject: Short-Term Rental Property Registration, 230-RICR-30-20-4.
Date: Saturday, October 12, 2024 7:23:58 AM

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1) As a registered host, I find the first of these changes confusing: The platforms with whom we list (the largest) ALREADY require us to post our registrations. Indeed, even once we have, they remind us to do it all the time. This is a frustrating waste of resources.

2) The purpose of this question is unclear and comes from a working commission whose work (and thereby conclusions) is not yet complete. Doesn't it seem reasonable that changes to regulations wait for a conclusion of the commission's work. Since the commission leadership is heavily biased against STRs and seems intent on co-mingling concerns of long-time seasonal communities (and their long-time concerns and issues) with communities for whom these things are not of concern, it seems very important to the STR sector that changes to regulations that govern us be made only after the commission is completed and the public (especially hosts) have the opportunity to weigh in-something we have been fully deprived of to date.

3) While changing to an annual registration is not the end of the world, it does make more work for hosts and there is no clear reason for this change. That said the DBR has been wonderful at alerting us to renew so as long as that continues, this seems reasonable.

Drake Patten
Hurricane Hill Farm

Selling Heritage Goods
Hosting Farm Events
Raising Leicester Longwool Sheep

https://urldefense.com/v3/__http://www.hurricanehillfarm.com__;!!KKphUJtCzQ!NceRrErfo5mqDEzo0JMQgThdWDDfnsdAbo52aQ5Dr-sFnuP7T5W0xXNo4PKMfEWAzoSdC4IMolL0ZXUb3QEiQf3t-4c$[hurricanehillfarm[.]com]
Cranston RI

401 932 4884

Shave ‘em to Save ‘em!

From: D Williams
To: REInquiry, DBR (DBR)
Subject: Proposed amendments to its regulation entitled Short-Term Rental Property Registration, 230-RICR-30-20-4
Date: Friday, October 11, 2024 11:59:33 AM

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1) yes, lower fee to $25.
2) should be $25 for 2 years
3) why do you need to know what kind of property the STR is?
4) yes, the expiry date should accompany the registration # on the platform

Keep things simple/easy, and you'll get much better compliance!!

Thanks - Donna

Donna Williams (she/her/hers)
Cell/text 401.451.6599
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From: Avram Dorfman
To: REInquiry, DBR (DBR)
Subject: Short-Term Rental Property Registration comments
Date: Friday, October 11, 2024 11:51:21 AM

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Hello,

I have just reviewed the proposed updates to the Short-Term Rental Property Registration code.

My comments are that I this rule should be more lenient for owner-occupied rentals than for rentals of entire dwelling units.

My suggestion is that for owner-occupied rentals - that is rentals in which the renters are sharing common areas with the owner in his or her own personal dwelling, should:

• Only have to pay the first time they register
• Only have to re-register biannually
• The re-registration is simply a recertification that the owner still resides in the same dwelling that is offered for short-term rental

Thank you,
Avram Dorfman

From: Donna Parssinen
To: REInquiry, DBR (DBR)
Subject: Short-Term Rental Property Registration, 230-RICR-30-20-4
Date: Sunday, October 13, 2024 10:24:52 AM

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Dear DBR,

Thank you for the email in regards to the changes of the STR registration at the State level.

My comment is that since the State has a STR registration that there should not be additional registrations at the local level with additional expenses for both the STR owner and the towns themselves to administer a registration at the local town level when the State already has done a registration which the town can use as a resource.

Greetings,

Donna Parssinen

From: Jeffrey Miksis
To: REInquiry, DBR (DBR)
Subject: Short term rental
Date: Tuesday, October 15, 2024 6:22:48 AM

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I am opposed to all regulation and registration of short term rentals. It's an unnecessary over reach of government. I think it's a wasteful allocation of manpower and resources. What's the registration for? What's being done with this list of registered people? It's pointless.

Any property owner should be free and clear to rent to whoever they see fit for whatever length of time they see fit.

Thank you.

Jeff

Jeffrey Miksis
401-632-2744

From: Mary E Stover
To: REInquiry, DBR (DBR)
Subject: Short Term Rental Registration Proposed Changes
Date: Sunday, October 13, 2024 9:18:10 AM

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As Principal Broker and Broker of Beach Real Estate, we OPPOSE the changes because its cumbersome and over reaching to require our Real Estate Agency to "police" our 55 homeowners, who already have REGISTERED at the DBR, the RI Health Department, and now our Local Town of New Shoreham STR Registry, it's beginning to feel extremely business unfriendly with all these require registrations, and required annual charges and registration numbers to keep track of! We at Beach Real Estate are a 2 person operation, Nancy Pike as Broker-Owner, me as Principal Broker-Owner, and these new requirements all of a sudden have increased our office time by many fold. Our homeowners are often of a generation that online registration is a huge challenge, so the burden falls onto us to walk each person through the cumbersome websites and get the job done. Perhaps there is a HELP number that can be displayed boldly on the website so each Homeowner can call your department to help walk all these homeowners through the process? Otherwise, this annually registering and annually changing all these registration numbers is too cumbersome and time consuming! If it's the online rental services that are NOT real estate agencies that you are after, it's easy enough to pinpoint those property owners and to pinpoint THEM.
Sincerely,
Mary E Stover and Nancy D. Pike.

--
Mary E Stover, Principal Broker

Beach Real Estate
Global Reach with a Personal Touch
PO Box 1468
Block Island, RI 02807
cell 401-465-7002
www.biBeachRealEstate.com [bibeachrealestate.com]
https://www.facebook.com/BeachRealEstateBlockIsland [facebook.com]
[facebook.com]

From: E Ndush
To: REInquiry, DBR (DBR)
Subject: Re: RI Short-Term Rental Regulation – Proposed Amendments
Date: Friday, October 11, 2024 12:31:44 PM

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Hi there,
I vsn attend the hearing but as of right now I live in my home which is a single home!

Thank you

On Fri, Oct 11, 2024, 11:42 AM REInquiry, DBR (DBR) <DBR.REInquiry@dbr.ri.gov> wrote:

> The Department of Business Regulation has proposed amendments to its regulation entitled Short-Term Rental Property Registration, 230-RICR-30-20-4. The Proposed Amendments and Notice of Proposed Rulemaking, including a summary of the proposed changes, may be found under the "Rulemaking Documents" tab after clicking on this website: https://rules.sos.ri.gov/Promulgations/part/230-30-20-4.
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From: K Bernard
To: REInquiry, DBR (DBR)
Subject: Bernard Submitted Comments: Department of Business Regulation
Date: Wednesday, October 23, 2024 9:56:14 AM
Attachments: testimony FINAL.docx

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To Whom It May Concern,

I am writing to express my opposition and ongoing concern over the recent legislative changes per RI General Law §45-24-73: prohibiting established ADUs to be rented on a short-term basis. My husband and I both live and work in South Kingstown, where we own a home. We saved money to convert an unsafe and inhabitable attached garage into a studio apartment, with the intention of eventually using the space to care for our aging parents. A big part of our calculation as to whether we could afford this construction was the knowledge that we could rent this space short term on a platform such as VRBO. We responsibly had the apartment permitted as an Accessory Apartment rather than an In-Law Apartment with this expressed purpose in mind. As a result, we paid much higher permitting and associated fees, and we continue to pay higher taxes and increased public utilities for this space—whether or not the ADU is rented.

This sudden and short-sighted law change has substantial impacts on our income and how we make ends meet. It makes a legal apartment and income stream suddenly illegal.

It also prevents us from using our home as we need. It was never our intention to host a long-term renter and we can't do so. First, our space is not a good fit for long-term renting, and second, we still need occasional use of the space for our own family needs. If the intention was to force ADU owners to rent long term, you have completely missed the mark.

Besides having a punitive impact on those of us serving as responsible homeowners and on-site hosts, this law change is negatively impacting tourism and local businesses. We have already hosted over 75 visitors who usually stay two nights. As the person cleaning the space, I can tell you that they almost exclusively eat out and ask us for restaurant recommendations all the time. They visit Newport, Block Island, Watch Hill, Narragansett and the local colleges. They tell us how our ADU is a better fit for their travel needs than a hotel, and because of it, they want to come back.

The change benefits the hotel industry and gives hotels the freedom to set pricing as high as they want by taking away the only alternative. Worse, it does so at the expense of RI residents and homeowners who rely on short-term rentals to afford housing in this state.

This newly adopted State Law is the wrong direction for RI. Tourists need and want more options to visit the state. And for ADU owners like myself, it is particularly harmful and punitive. There was no consideration of the sacrifice and investment that went into building our ADU, the negative impact to our finances, and no mechanism offered to even "grandfather" our existing ADU for short term rentals. My husband and I have been very responsive hosts, who live on site, and closely manage our short-term rental. We pay all taxes, utilities, and State and local registrations. We have been good ambassadors for the State of RI for all who stayed with us. In return, the State has punished us for what seems like a favor to the hotel lobby.

I sincerely hope you will amend RI General Law §45-24-73 to once again permit ADUs to

serve as short term rentals, or at least make the change to affect only ADUs constructed after June 25, 2024 so that this legislative change can be fairly considered ***before*** construction.

Sincerely,

Kim Bernard
78 Oak Hill Rd
South Kingstown, RI

From: Kate McCarthy
To: REInquiry, DBR (DBR)
Subject: Re: RI Short-Term Rental Regulation – Proposed Amendments
Date: Friday, October 11, 2024 1:07:25 PM

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How hard is stupid RI gonna hammer the middle class this time

On Fri, Oct 11, 2024, 11:33 AM REInquiry, DBR (DBR) <DBR.REInquiry@dbr.ri.gov> wrote:

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INFORMATION IN THE E-MAIL TO ANY THIRD PARTY.

From: Pzanecchia
To: REInquiry, DBR (DBR)
Subject: Short term rentals.
Date: Friday, October 11, 2024 12:58:10 PM

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I suggest that you dispense with the subterfuge and just take ownership over these short term rentals since the direction of this legislation is just heading to fascism. This is not to protect consumers but just heavy handed government influence to the marketplace. Least business friendly state in the whole country.

Paul Zanecchia
Message sent from iPhone
508.698.2212 cell
401.595.3107 cell