



January 6, 2020

Mayor Gallego
Councilmembers
City of Phoenix
200 W. Jefferson Street
Phoenix, AZ 85003

RE: City Code Amendments: Short-Term Rental Registration (Ordinance G-6653)

Mayor Gallego and Councilmembers:

I write to you on behalf of Expedia Group and its family of brands, including the leading vacation rental platform Vacation Rentals By Owner (Vrbo), to respectfully request that you delay consideration and adoption of the proposed vacation rental ordinance-- item No. 107 on the formal Council agenda this Wednesday, January 8, 2020.

By way of background, Expedia Group platforms Vrbo and HomeAway are world leaders in the vacation rental industry, helping families travel together with more than two million places to stay in 190 countries. Our sites make it easy to find and book the perfect rental for a getaway, often for less than the cost of other accommodations. Our average customer is a female traveling with a family of four. We are distinct from our competitors not only based on the nature of our customers, but also by virtue of our collaborative approach to policy making.

Across the globe Expedia Group is supporting legislative efforts toward fair, commonsense, and evidence-based regulation of the vacation rental industry and is committed to fostering an affordable, accessible, and responsible vacation rental marketplace in compliance with local regulations.

We appreciate the regulatory changes the City of Phoenix is seeking to make with respect to vacation rentals, however, we request at least an additional 30 days to better understand the city's concerns with vacation rental compliance and operation, and work with the City on provisions impacting platforms (marketplaces).

An obligation for platforms to assume a form of liability for the compliance of users that advertise on their sites is detailed, complex and can be complicated for all parties to implement— for the City, platforms and operators. There are many considerations that have yet to be made regarding exactly how such a system would work and how the city would enforce it. This is an extremely pressing issue that requires more than one sentence in the City's vacation rental ordinance; a vote should not be taken until the City has had the additional opportunity to work with platforms, and Council has fully vetted a detailed proposal on the matter.

We would also like to take this opportunity to remind you that all Expedia Group vacation rental platforms already have a dedicated field where operators may display their permit numbers, making it easier for cities to verify compliance.

In the meantime, we are happy to discuss with city staff and your offices on how we can assist with short-term rentals in the City of Phoenix. Some examples include:

- Outreaching operators to reiterate requirements under state and local law, highlighting the permit field for their use.
- Providing operators with best practices and good-neighbor policies.
- Working with the city to address any existing nuisance-causing properties that may be listed on our sites.

Expedia Group remains eager to work with you on vacation rental policies that serve both short-term rental homeowners and the broader community, and we hope you will give this matter the time and attention it deserves.

Thank you for your consideration of this request.

Respectfully,

Ashley Hodgini
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CC:

Alan Stephenson
Director, Planning & Development