



October 4, 2017

St. Paul City Council  
Honorable Russ Stark, President  
15 W Kellogg Blvd  
St Paul, MN 55102

Dear President Stark and Members of the City Council,

On behalf of Expedia, Inc. and its family of travel brands, including vacation rental leaders HomeAway and Vacation Rentals By Owner (VRBO), I write to express significant concerns with the proposed ordinance to restrict vacation rental platforms in St. Paul and highlight the impact it would have on local vacation rental owners.

HomeAway's typical customer is a 50-year-old female traveling with a family of four, typically for a stay of seven or more days for a vacation or special event. Vacation rentals and the families they serve have been part of St. Paul's tourism economy for generations. They provide a unique, genuinely St. Paul experience for visitors, and a convenient, comfortable, and economical home base for families during short-term employment or lengthy hospital stays.

In cities around the country, Expedia, Inc. is supporting legislative efforts toward fair, commonsense regulation of the vacation rental industry. Like the City of St. Paul, Expedia, Inc. is committed to fostering an affordable, accessible, and responsible vacation rental marketplace in 100% compliance with local regulations. The proposal as written contains language that undermines these goals. We encourage the City to defer consideration of these ordinances and work together with Expedia, homeowners, neighborhoods, and other interested parties to create a sustainable and workable regulatory structure.

Provisions within Section 379.06 are impractical and conflict with the Stored Communications Act and Section 230 of the Communications Decency Act. Other cities that have enacted similarly broad and unworkable requirements on vacation rental platforms have seen their vacation rental markets move underground to less onerously regulated online bulletin boards and classified ad services, jeopardizing the safety of owners and guests as well as municipal revenue streams. Expedia and its brands stand ready to help create Federally-compliant, practical registration, enforcement, and data sharing infrastructure in St. Paul.

As the Twin Cities prepare for an influx of national and global travelers in early 2018, Expedia, Inc. stands ready to help craft effective regulations that would ensure an affordable, accessible, and responsible vacation rental market in St. Paul. Thank you for considering these concerns as you hear this and future proposals. I look forward to continuing to work with you and your staff toward a regulatory package that works for St. Paul. Please feel free to contact me with any further questions.

Sincerely,

**Richard de Sam Lazaro**  
Expedia, Inc., Government Affairs Manager, Northwest  
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