

## Council File: 14-1635-S2

1 message

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'John Choi' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Fri, Jun 14, 2019 at 4:50 PM

Reply-To: John Choi <john.choi@airbnb.com>

To: clerk.plumcommittee@lacity.org, clerk.cps@lacity.org

Submitting the following public comment for this item scheduled to be heard before PLUM committee this Tuesday, June 18th.

Thank you

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**John Choi**  
Public Policy  
Los Angeles

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 **6-17 Airbnb Letter to PLUM.pdf**  
93K



June 17, 2019

The Planning and Land Use Management Committee  
City of Los Angeles  
200 N. Spring St.  
Los Angeles, CA 90012

Chairman Harris-Dawson and PLUM Committee Members,

As you know, the Home Sharing Ordinance (HSO) adopted in December takes effect on July 1st. As currently proposed, at that time, thousands upon thousands of local residents will begin registering with the city to rent their homes as a short-term rental. Airbnb is committed to working closely with the city both to help communicate with residents about the system, and to work with the city to ensure compliance is smooth and accurate. Moreover, we appreciate the time and effort that city staff has invested in developing the draft rules and registration. In our experience in working with many different cities, launching these systems is complicated, challenging, and require adequate preparation (by all stakeholders) and resources to make it run well.

Nevertheless, we are highly concerned that given the current status of preparation there is a likelihood that the registration process will not launch smoothly and will subject the city to becoming overwhelmed with thousands of applications for which its not fully prepared, while the hosts and platforms will have limited opportunity to provide feedback on the system and the rules given the lack of information we received until very late in the process. We have shared these concerns and questions repeatedly in letters to the Planning Department, beginning in February, to which we have not received responses.

As you are likely aware, the HSO provides three ways for online platforms to be deemed in compliance: (1) directly follow ordinance language in Subdivision 32(f)(1)-(4), (2) abide by the administrative rules set forth subsequent to the ordinance, or (3) enter into and comply by the terms of a platform agreement. We did not receive an opportunity to review a draft summary of the administrative rules until receiving them late in the day on Thursday, June 12. Additionally, at the suggestion of the City, we provided a draft platform agreement to the city staff on April 26, and have not received feedback, and no master platform agreement has been provided for today's meeting.

Our inability to consider and collaborate on these documents, ask questions, or provide feedback has made it impossible to understand in the time allotted (or in the case of the platform agreement, due to the lack of the document altogether) how to comply with this law or to build our systems accordingly. Additionally, in the absence of the administrative guidelines until just a few days ago there has been no opportunity to begin educating local residents who

will want to register about what that process will entail. A vital question that is foundational to all aspects of the system -- will hosts be able to list their spaces while their application is pending -- remains vague.

We do not believe that the City should launch a short-term rental registration system without adequate preparation in order to avoid confusion and chaos both at the city and among hosts. To best prepare, the platforms, who need to be a partner in this work to make the system effective, need to have adequate time to review and comment on the administrative guidelines, negotiate with the city on a platform agreements, and work with the City and its vendor on ensuring that the system works and that systems for both the city and platforms are well integrated.

Your staff has suggested that the City might launch its registration system on July 1 with a subsequent 120-day grace period to allow hosts to review and comply with the registration requirements before enforcement begins. We feel strongly, given the lack of information we have received from the City despite our repeated requests, that the 120-day clock should not start ticking until the administrative guidelines and platform agreement are finalized, and we have technical documentation describing the architecture of the City's systems in detail. Without this clarity, it is not possible for our teams to plan and produce our own corresponding systems. If the rules are not clear, that the operations of both the city's systems and those of the platforms are not well coordinated, the City's system is likely to become quickly overwhelmed.

We remain committed to supporting the City's goals, and expect to use every tool at our disposal to properly educate our host community of their responsibilities. However, approving the administrative guidelines today is premature given the inability of platforms to have a reasonable opportunity to provide input. We urge you to take prudent steps to plot a sensible pathway forward that ensures a successful registration and enforcement system in Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read "John Choi". The signature is fluid and cursive, with the first name "John" and last name "Choi" clearly distinguishable.

John Choi  
Policy Manager, Los Angeles  
Airbnb

CC: The Honorable Herb Wesson, President, Los Angeles City Council