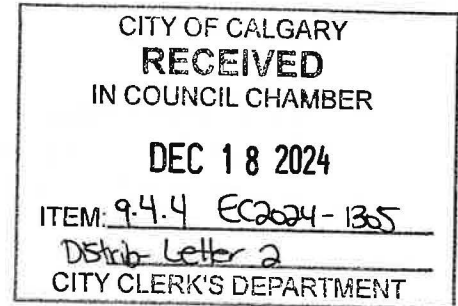




December 11, 2024

Mayor Jyoti Gondek and Councillors
City of Calgary
800 Macleod Trail SE
Calgary, AB
T2G 2M3



RE: Bylaw to Amend Bylaw 32M98, the Business Licence Bylaw (Short-Term Rentals)

Dear Mayor Gondek and Councillors:

On behalf of Expedia Group and its family of brands, which includes Expedia.ca, Hotels.com and Vrbo.com, I'm writing to you regarding the Proposed Business Licence Bylaw 32M98 amendments (short-term rentals).

As a global platform that offers the complete range of travel accommodation – including all manners of hotels and whole-home vacation rentals – and as a partner to Travel Alberta on two successful tourism campaigns through our Media Solutions division, Expedia Group has a broader perspective on these policy recommendations than most stakeholders.

Overall, we appreciated the opportunity to meet with Prof. Lindsay Tedds during the University of Calgary's research and consultation phase. And our vacation rental owners were also grateful to provide some input through the City's survey. Finally, we appreciated the Administration's willingness (in response to Councillor Gian-Carlo Carra's question last week) to consider changes based on stakeholder feedback.

Now that the Administration has come forward with policy recommendations, which were approved by the Executive Committee last week and will be considered by Council on December 17th, Expedia Group wanted to provide our comments to Council and the Administration. By and large, we believe that the Administration has struck an appropriate balance with these recommendations. We do, however, have a few small changes that we are seeking to ensure that they are feasible for us to implement, while still maintaining that balance:

- As currently drafted, this bylaw would come into force on January 1, 2025. Given that by the time Council passes the bylaw it will already be past the mid-December mark, and quickly soon thereafter the holiday break, having less than two weeks to comply is far too quick to ensure proper implementation of these changes. Indeed, given that platforms will now be required to ensure STR operators are informed of the new provisions, the need to make changes to our internal systems as it relates to data sharing, and even simply ensuring our own platform registration with the City, we believe that April 1, 2025 would be a much more reasonable date for the bylaw to come into force. We also believe this date is appropriate timeline given the market, particularly in Calgary, tends to be more seasonal with spring/summer seeing the height of demand and would be in force before that time.

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- **Subsection 58.2(4)(b)** would require a Short Term Rental Company to “*provide to the Director, on a monthly basis, a current list of all Short Term Rentals located in the City that are listed with the Short Term Rental Company, including the licensee’s name, address and licence number and the number of nights during the previous month that it was rented*”.

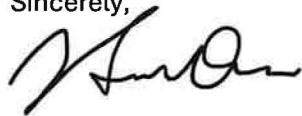
We would respectfully request that these data points instead be provided on a quarterly basis, rather than monthly. In other jurisdictions that we operate, we find that quarterly reports are often the best at striking a good balance between helping City administration have the tools they need to enforce compliance on a current and timely basis, while not administratively burdening global platforms with monthly reports that eventually get to the point of very minimal non-compliant operators. In respect to the remainder of the requirements in this subsection, Vrbo can comply. We would strongly stress, however, that *all* short-term rental platforms be held to the same standards. In other jurisdictions, we are aware that this is not always the case.

- **Subsection 58.2(3)(b)** would require a Short Term Rental Company, such as Vrbo, to provide “*any other information or documents required by the Director*”.

Data sharing provisions can be challenging for various reasons (e.g., the privacy of our customers and our owners, and the difficulty of trying to change a global platform based on the requirements of many different jurisdictions). We believe that this provision is overly broad in its language. Instead, we would request that the required information be stipulated in the bylaw (as required information is already) and for subsection (b) to be removed.

Thank you for your time in reading this. Should you be interested in additional information or if you would like to discuss Expedia Group’s comments in detail, please do not hesitate to contact me at +1 343 961 6687 or hdoubt@expediagroup.com.

Sincerely,



Hunter Doubt
Manager, Government and Corporate Affairs – Canada
Ottawa, ON

cc: Deb Hamilton, General Manager, Planning & Development Services
Brenda Desjardins, Director of Calgary Building Services
Antonio Faiola, Manager of Business Experience