February 13, 2023

Executive Policy Committee
Winnipeg City Council
510 Main Street
Winnipeg, MB R3B 1B9

RE: Regulating Short-Term Rental Accommodations

Dear Mayor Gillingham & Committee Members:

On behalf of Expedia Group and its vacation rentals platform Vrbo, I am writing to you in respect of the Public Service's recommendations regarding Short-Term Rental Accommodations (STRAs).

Expedia Group has appreciated the opportunity to provide input into the City's policymaking process thus far and applauds the Public Service for seeking to maintain an affordable type of accommodation that is used by traveling families (often requiring multiple bedrooms, kitchen and laundry facilities) and largely unavailable through hotels (at least not affordably).

As a global online travel company, we know that it is important for jurisdictions to permit a broad range of accommodation options, and certain of the Public Service's recommendations would help accomplish that goal in our view. In particular, we applaud the reasonable compromise that the Public Service has recommended for non-primary residence STRAs (Part 4).

That being said, there are two provisions in the Public Service's recommendations under Part 5 (STRA Platforms) with which we likely would not be able to comply:

1. We do not anticipate being able to collect the proposed accommodation tax on behalf of the renter whenever someone rents a STRA, and remit that to the City as a condition of maintaining our licence. We would instead propose that the City seek for the provincial government to be the taxing authority on behalf of all of Manitoba's municipalities.
2. In addition, and also under Part 5, we propose the following changes:
    a. Change "No STRA platform may list properties as STRAs in Winnipeg without a license issued by the City of Winnipeg under the By-law" to "No STRA platform may list properties as STRAs in Winnipeg without requiring the listing creator to enter a properly-formatted STRA license number into their listing before accepting a booking." This is the standard method in North America for ensuring only licensed properties list on the platform.

b. Remove from the record-keeping requirement, "rental type – entire home or rooms, or primary residence," or make it contingent: "if collected by the platform." Vrbo does not collect this information, instead enforcing a policy that only entire homes are permitted on the site.

In respect of these two provisions impacting platforms, we would welcome the opportunity to work with the Committee and the Public Service on alternatives that we would be able to implement.

Thank you for your time. Should you wish to contact me, I may be reached at 343-961-6687 or hdoubt@expediagroup.com.

Sincerely,



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cc: Mr. Marc Lemoine, City Clerk
Ms. Brenda Jasper, Manager, Strategic Initiatives & Project Development