

**Letter from member of RBOAA to VRBO/HomeAway**  
**Posted on the VRBO/HomeAway Community Discussion Pages on November 25, 2018**

(Erinn, is the VRBO/HomeAway Community Liaison)

For Hawaii listings, Erinn, what's going on with this Registration Number box that's just popped up?

Erinn, perhaps I missed the heads-up-from-VRBO memo. And as those of us active in the TVR policy issue in Hawaii know, our State and County officials regularly read this forum, so I'll apologize in advance to owners for the length of what follows, as some of it is intended for our friends in Hawaii State and County governments.

In the last few days, a "Registration Number" box has appeared on our VRBO-HA Hawaii listings into which we should enter our HI Tax ID (or license number, etc., as they are variously called by local authorities). You may recall, Erinn, that I asked you about this back in October, and your response was that no such feature existed for Hawaii, and that our provision of the information within the "Description" field would have to continue.

Two significant events have occurred since then: The disastrous October VRBO solicitation letter for local residents to list their properties with VRBO (based on zoning of many recipients who received the letters, the action would have been illegal); and, likely related, the success of a ballot measure on Maui in November assigning initial fines of \$20K to owners of illegal TVRs on Maui, and \$10K per day of continued illegal operation.

This latter event is made more compelling by an August announcement by Maui County that it had developed a list of illegal vacation rentals using a contracted company. The County promised to release the list in September. It didn't. And with the ballot measure passing in November setting an initial fine of up to \$20K for operating an illegal TVR, then \$10K a day after that for its ongoing illegal operation, it's essential that VRBO-HA take no further action to undo the good work done by so many to rein in illegal Hawaii TVRs, and to ease the legislative pressure on legal TVR owners.

Accordingly, many thanks to VRBO-HA for adding a "Registration Number" box on Hawaii owners' listings. There was no warning from VRBO-HA to Hawaii owners of the addition of same, but I am glad it is now there after we asked for it in October.

Erinn, I'd like you to talk to your chums who added this feature and who are in charge of it. Here's why:

Our informal group, which participates in ensuring fairness and accuracy of Hawaii's TVR legislative efforts, has determined that in just our own listings on VRBO-HA, the surprise addition by VRBO-HA of the "Registration Number" box contains a bigger gift inside: the auto-populated insertion by VRBO-HA of old, out-of-date Hawaii Tax IDs that were replaced by a new series of numbers in August, 2016. Put simply, VRBO-HA has, on its own initiative and without advance notice to Hawaii owners using the VRBO-HA TVR listing service, added a "Registration Number" box and filled it with incorrect information.

In the case of Maui County (and the other Counties, to be sure) it's quite likely that the company looking for HI Tax IDs to determine if the TVRs are legal might look for same in the newly created "Registration

Number” box. Finding the box to be empty would likely create an issue for the TVR owner. Finding the box to contain a Hawaii Tax ID fully two years out of date (old numbers have the “W” prefix) would surely do the same.

When I and others informed VRBO-HA, both through this public, open-to-all, “Community Forum” and other avenues of our and Hawaii residents’ and officials’ negative reaction to the solicitation by VRBO-HA of what would have been illegal Hawaii vacation-rental listings, I asked that with VRBO-HA being located in Texas, it might wish to make use of the expertise of its Hawaii customers before it launches any other action that would cause upset or confusion in the state, and jeopardize the ability of legal TVR operators to continue to operate.

I think the surprise addition by VRBO-HA of these “Registration Number” boxes on Hawaii customers’ listings, the unilateral decision by VRBO-HA to populate them on its own, with unverified and incorrect information, and to do so without the legal TVR owner’s knowledge of such an intent is a regrettable response to my suggestion that VRBO-HA, based in Texas, defer to, and work cooperatively with local Hawaii knowledge when it chooses to visit the State through policy and marketing decisions likely to have impact in Hawaii. VRBO-HA just isn’t listening to good advice.

Again, I’m not sure when VRBO-HA added the “Registration Number” box. Perhaps it was in the lead-up to the holiday weekend when people are a bit distracted. Despite another failure by VRBO-HA to let its Hawaii customers know in advance about a VRBO-HA action that significantly affects their customers’ interests vis-à-vis Hawaii and County action on, and requirements of, TVRs, this addition of the “Registration Number” box is a welcome addition.

But given the anger in HI towards TVRs, and the local outcry over — and their electeds’ reaction to — the VRBO solicitation letter earlier this fall, my sense of it is that HI owners might well be wise to immediately seek out that “Registration Number” box on their listing, and if it’s empty, fill it with their current and proper HI Tax ID Number. Further, if it has been auto-populated by VRBO-HA with a ID number with the prefix “W”, immediately remove that erroneous and out-dated information unilaterally inserted by VRBO-HA and replace it with the correct information.

Again, my apologies to all for the length of this note. But given the wide audience that participates in reading the VRBO-HA “Community Forum,” it’s important that Hawaii State and County officials know that Hawaii owners who are customers of VRBO-HA were fully surprised by this latest dipping by VRBO-HA of their toes in Hawaii waters, hence either the empty “Registration Number” box on their listings, or one populated by VRBO-HA with old, out-dated information.

Erinn, perhaps you could also pass this one along to your GR people. Thanks.