Dear NASAA Officials:

I am writing to express my strong opposition to the proposed NASAA Model Franchise Broker Registration Act. As a small franchise broker who has been helping prospective franchisees find suitable opportunities for the last seven years, I am deeply concerned about the unintended consequences this legislation would have on my business and the industry as a whole.

Excessive Regulatory Burden
The proposed registration requirements would create an overwhelming administrative burden for small operators like myself. The compliance costs alone could force many of us out of business, ultimately reducing the resources available to help prospective franchisees navigate their options.

Overly Broad Definitions
The definition of "franchise broker" in the Act is far too broad and would capture individuals who simply make referrals or provide information, not those actually engaged in franchise sales. This would require countless business professionals to register unnecessarily.

Operational Challenges
The 5-year record retention requirement far exceeds standard business practices and IRS requirements. Most businesses retain records for 3 years, making this requirement both excessive and impractical.

I urge you to reconsider this legislation or significantly modify its scope to avoid harming the small businesses that provide valuable services to the franchise community.
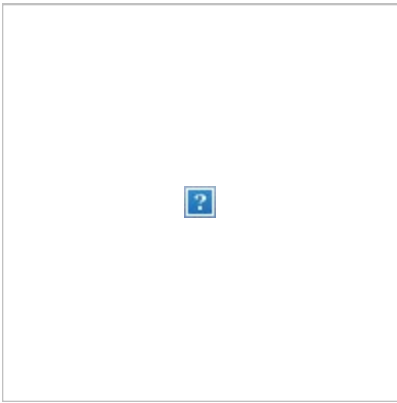
Respectfully,

David Whalen

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Connect with me, book an appointment here