

From: [Rob Petka](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]Concerns About the Proposed NASAA Model Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 2:33:56 PM

Dear NASAA Officials,

I'm writing because I'm really worried about the new NASAA Model Franchise Broker Registration Act. As someone who works as a small franchise broker and has been helping people find the right franchise for several years, I think this proposal could hurt small businesses like mine a lot.

Too Much Extra Work

The registration requirements seem like they'd be really hard for small brokers to keep up with. The costs and paperwork could be so overwhelming that many of us might not be able to stay in business, which would mean fewer people to guide new franchisees.

Definition Is Too Broad

The way "franchise broker" is defined feels way too broad. It would pull in people who are just making referrals or sharing info—not actually selling franchises. That seems unnecessary and unfair.

Record-Keeping Problems

The rule about keeping records for 5 years also doesn't make sense. Most businesses only need to keep them for 3 years, so asking for more just feels unrealistic.

I really hope you'll think about changing or adjusting this legislation so it doesn't end up hurting the small businesses that are trying to help people succeed in franchising.

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Sincerely,

Rob Petka

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