

**From:** [William Huffhine](#)  
**To:** [NASAA Comments](#); [Theresa Leets](#); [bill.beatty@dfi.wa.gov](mailto:bill.beatty@dfi.wa.gov); [Erin Houston](#)  
**Subject:** [EXTERNAL]Economic Impact Comments - NASAA Model Franchise Broker Registration Act  
**Date:** Wednesday, August 27, 2025 3:17:35 PM

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Dear NASAA Representatives:

I am writing to highlight the significant economic impact the proposed Model Franchise Broker Registration Act would have on entrepreneurship and small business development.

I am a franchise broker in the state of Michigan and I resonate deeply with the power of franchising in a state's economic livelihood. One of my recent candidates was affected by layoffs at General Motors in my state. Thanks to my assistance as a broker, and an outstanding emerging franchise system, he is now a thriving business owner with a very successful business. His experience with the emerging franchise has exceeded his expectations and he continually expresses appreciation for the work we did together.

When corporations fail families and communities, business ownership, particularly franchise models, keep the economic lifeblood of families and communities flowing.

Due to the administrative and financial burden placed on franchise brokers, here are a few examples of the damage the Franchise Broker Registration Act would cause to entrepreneurs, their families, and the communities in which they live if a more reasonable approach is not found.

### **Entrepreneurship Barriers**

This legislation would create new barriers to entrepreneurship by eliminating professionals who help people transition from employment to business ownership. Many successful franchisees first learned about opportunities through broker relationships.

### **Small Business Impact**

The franchise industry is built on small businesses serving local communities. By making it harder for emerging brands to reach potential franchisees, this Act would concentrate market power in the hands of large corporate systems.

### **Economic Multiplier Effect**

Each new franchise creates jobs, generates tax revenue, and supports local suppliers. Reducing the number of new franchises through regulatory barriers would have negative ripple effects throughout local economies.

### **Innovation Concerns**

New and innovative franchise concepts often rely on broker networks to reach early adopters. This legislation would make it harder for innovative business models to gain market traction.

I urge you to consider these broader economic implications and work with stakeholders to find solutions that address legitimate concerns without stifling economic growth and innovation. A single registration and education requirement that is reciprocal between states would be a positive solution while still supporting franchisees and economic growth in these communities.

Respectfully submitted,

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President

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