Baltimore Hotel Corporation 36 South Charles Street Suite 1600 Baltimore, MD 21201

MEMORANDUM

TO:

Honorable President and Members of the City Council

Attention: Natawna Austin, Executive Secretary

FROM:

William H. Cole, Chairman

Baltimore Hotel Corporation

DATE:

December 15, 2014

SUBJECT:

City Council Bill No. 14-0464

Hotels - Human Trafficking Prevention

The Baltimore Hotel Corporation (BHC) has reviewed Council Bill 14-0464 for the purpose of requiring the registration of all hotels in the City, prohibiting from renting out sleeping accommodations for a period of less than ½ day; and requiring that hotel employees receive training in how to identify human trafficking activities, victims relating to the operation of hotels in Baltimore City.

BHC has reviewed the proposed legislation and does not support this bill, and respectfully requests that this bill not be given favorable consideration by the City Council for the following reasons:

1. Definition of one-half day:

If defined as 12 hours, there are many legitimate purposes for rentals for less than that amount of time. In one example, since the checkout time at the Hilton Baltimore is 12 noon, any customer arriving after 12 midnight (quite common) would be staying less than 12 hours. In fact, in the case of travelers staying one overnight, many do not stay for a 12 hour period – even if overnight.

It is common in this industry to sell rooms for a "day rate". This would apply most often to customers wanting to extend reservations beyond the normal checkout time to a time later in the day. Other legitimate uses for "day rate" would be situations like customers doing interviews in rooms, airline crew or passengers waiting/resting for late departing flights, and rooms being used for meetings.

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2. Training:

This bill is not particularly business-friendly as it will impose an additional cost of the required training and certification to the staff on to the business. In a hotel such as the Hilton Convention Center Hotel, the cost of training could be \$10,000 or more. Of the 425 employees at the Hilton Baltimore, approximately 40 employees would warrant any type of training.

3. Penalties:

This legislation also criminalizes the lack of compliance, thus exposing hotel owner/operators to fines and jail if non-compliant.

4. Conclusion:

BHC certainly understands the intent of the proposed bill. Unfortunately, we cannot support the legislation as drafted and can offer no amendments that would satisfy our concerns.

cc: Colin Tarbert Angela Gibson