



Dear NASAA and Legislators,

My name is Carson Suppé – I am the Director of Franchise Development for Enviro-Master International Franchise, LLC, an international franchisor with over 100 franchise locations across the U.S.

I am writing to express my deep concerns regarding the proposed NASAA Model Franchise Broker Registration Act and the negative implications it will have on the franchising industry. While I whole heartedly agree with the importance of protecting aspiring entrepreneurs from unethical practices, I believe that this act, as currently drafted, creates undue burden on franchisors, consultants, coaches, brokers, et al., and will have a significantly negative impact on the industry.

Franchising plays a vital role in our economy, providing opportunities for entrepreneurship and job creation across various sectors. However, the success of the franchise model depends on a delicate balance of responsibilities between franchisors, franchisees, and other stakeholders. The Franchise Broker Registration Act threatens to disrupt this balance by imposing excessive regulatory requirements on franchisors, particularly in relation to their interactions with brokers.

One of the key concerns is the additional administrative and financial burdens that franchisors would face under this act. By mandating registration and imposing stringent standards on their dealings with brokers, franchisors would be forced to divert resources away from core business activities, such as innovation, support, and expansion. This could stifle growth, impact franchisee success, and prevent innovation within the franchising industry, ultimately harming both business owners, franchisors, and even end-user consumers who do business with the franchise owners.

Moreover, the act's provisions regarding dispute resolution could lead to an increase in frivolous or unjustified claims against franchisors. This would not only strain the resources of franchisors but also create a climate of uncertainty and litigation within the industry. Such a hostile environment would deter prospective franchisors from entering the market and could even drive existing players out of business.

Additionally, I am concerned that the act fails to adequately consider the diverse needs and circumstances of different franchising systems. What may work for one type of franchise may not necessarily be suitable for another. A one-size-fits-all approach to regulation risks stifling innovation and diversity within the industry, ultimately undermining its ability to adapt to changing market dynamics.

In conclusion, while I share the goal of protecting franchisees from unscrupulous brokers, I believe that the Franchise Broker Registration Act is not the appropriate solution. Instead of burdening franchisors with excessive regulation, I urge policymakers to explore alternative measures that promote transparency and accountability while preserving the vitality and competitiveness of the franchising industry.

Thank you for considering my concerns on this important issue.

Sincerely,

Carson Suppé, Enviro-Master International Franchise  
Director of Franchise Development