



Subject: NASAA Request for Public Comment – Franchise Broker Registration Act
To Whom it may concern:

I have been part of the franchising industry for almost 2 decades, with a variety of brands in different stages of business, some still emerging, and some were at their peak. I am currently the Brand President for 1-800-Packouts, an emerging brand with 32 owners and growing. We are part of the disaster restoration industry, which has been on a steady growth for many years due to uncontrollable elements and has been very beneficial to franchise owners throughout the US.

In the past we have attracted new franchise candidates through many avenues and more recently we have been reliant on Franchise Business Consultants, or Brokers. These folks, who usually are associated with a group of consultants, provide 70%+ of our new franchisees. This comes as the digital space continues to get flooded with more and more ‘distractions.’

The franchising industry has been governed by regulations and is designed to inform prospective buyers of all the risks with a franchise concept. In turn, this protects people more from less reputable companies through full disclosure as well as providing an ample amount of time while making such an important decision regarding this next step.

A true and good franchisor provides these entrepreneurs with a business model, if followed will improve the likelihood of success as well as access to on-going support, training, buying power and a network to continue to grow their experiences. All of this helps prospective franchisees chances of success while launching a new business.

All of this as a background, I am concerned about some changes that have been considered regarding the Franchise Disclosure process. I am in favor of full disclosure of any and all fees pertinent to starting a franchise and that Franchise Business Consultants receive remuneration for their services, there needs to be consideration on a process that might overburden stakeholders. Franchise Business Consultants are an important element of the ability for someone to begin their own business and the potential for all that comes with that dream. These new businesses drive the economy by creating more jobs, providing necessary services, and many provide elements to improve communities around the United States. As mentioned before, the franchising industry is heavily regulated and adding more regulations can and will cause too much of a hurdle for folks to follow their chance to be a business owner. It can lead to many folks trying it on their own and struggling financially creating a negative impact on the economy and the American Dream: Business Ownership.

Thank you for your time.

Regards,
Stefan Figley

President, 1-800-Packouts