

Ann,

I saw the notice of meeting for the potential changes to 254 CMR 2.00-7.00. I will be unable to attend and I did want to submit comments.

- 254 CMR 2.00 Licensure
 - Subsection 12: LLC, LLP Insurance - just curious why S-Corp isn't included here. My brokerage is run under my S-Corp and I have all required insurances (and am investigating Cyber Insurance)
- 254 CMR 3.00 Professional Standards of Practice
 - Subsection 9: Advertising - there need to be standards established to prevent the rampant use of Bait & Switch advertising in the real estate industry. The use of advertising like, "If you're home doesn't sell at the price and time you specify, I'll buy your home" and other similar is deceptive. I have received lists of requirements used by out-of-state brokers who use this deceptive practice and they list exorbitant commission fees, price reduction schedules, etc. It's deceptive and it needs to stop. It is harming the industry.
 - Subsection 9: Advertising - there need to be clear standards defined for online advertising. It's very common to see advertising that does not identify the broker or only includes a phone number or email address. The standard specifies, "... any advertising publication or other means..." This needs to be more explicit.

Overall, the requirements for obtaining licensure are far too low. I know that keeping the standards low encourages the growth of real estate schools (and, thereby, revenue through taxation to the Commonwealth) and licensing fees. On the national level, it is completely destroying the Realtor brand (I chose not to renew my membership for that reason) and how the profession is perceived. The standards created by the individual states need to be congruent and they're not.

I know that Executive Order 562 is about reducing unnecessary regulatory burden. I agree... yet that should not come at the expense of requiring true professionalism.

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Expect First Class,

Ryan

Broker/Owner, First Class Realty Group

Published Author, "What I Learned From People Like You: Stories of Wise Elders at Home"