



April 21, 2010

Ms. Marcia Rasmussen
Director, Planning Division
Town of Concord
141 Keyes Road
First Floor
Concord, MA 01742

Dear Ms. Rasmussen:

On behalf of the International Franchise Association I am writing to express opposition to potential town restrictions on so-called “formula” retail in the Town of Concord. Enacting these restrictions (Articles 46 & 47) would unfairly restrict the ability of franchised small business owners to offer their goods and services to the residents of Concord.

As the largest and oldest franchising trade group, the IFA’s mission is to safeguard the business environment for franchising worldwide. IFA represents more than 85 industries, including more than 12,000 franchisee, 1,100 franchisor and 500 supplier members nationwide. According to a 2008 study conducted by PricewaterhouseCoopers, there are more than 900,000 franchised establishments in the U.S. that are responsible for creating 21 million American jobs and generating \$2.3 trillion in economic output. In Massachusetts alone there are 15,768 franchised establishments, employing 199,000 workers and contributing \$18.5 billion in economic output.

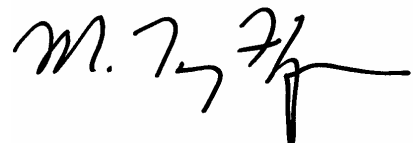
Many “formula” retail establishments are franchised businesses that combine local small business investors with a known national brand to create an expectation of quality, consistency and value to consumers. The fact that they are managed in accordance with guidelines provided by a corporate entity that may be headquartered elsewhere should have little bearing on their ability to do business in Concord.

Like any other small business, a franchise’s success depends on the franchisee’s own capital, hard work and long hours. Like any other enterprise in Concord, a franchise operating there would pay taxes, be involved in supporting community activities and create economic opportunities for employees and suppliers who would directly benefit from the existence of the enterprise.

The town should not impose its will on the consumers of Concord, but should instead allow the community to decide through the marketplace if a “formula” retailer is acceptable to them. Indeed, franchised businesses successfully coexist in many historic or traditional business districts alongside local institutions and establishments.

I urge you to reconsider the proposed restrictions on “formula” retail businesses. Such drastic steps not only harm your community by weakening its economy, but they are contrary to the most basic tenets of American entrepreneurship and fairness.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Troy Flanagan". The signature is stylized and includes a long horizontal flourish at the end.

M. Troy Flanagan
Director, Government Relations

cc: Board of Selectmen