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December 17, 2020

Federal Trade Commission
Office of the Secretary
Constitution Center
400 7th Street SW
5th Floor
Suite 5610 (Annex F)
Washington, D.C. 20024

**Re: Franchise Rule
16 CFR Part 436
Comment, Matter No. R511003**

Dear Acting Secretary Tabor:

The undersigned brands write regarding the September 4, 2020, announcement of a public workshop and request for public comment made by the Federal Trade Commission (FTC) regarding its decennial review of the FTC Franchise Rule. For the benefit of all stakeholders involved in the franchise business format, we strongly urge the FTC to extend the Franchise Rule. Since the development of the first Franchise Rule promulgated in 1978, the rule has been one of the most important measures for the franchise sector, detailing important consumer protections for the 733,000 franchise establishments that employ more than 7.6 million Americans, over 30 percent of which are owned by minorities.

This essential rule delivers clear guidelines for franchise brands to follow and transparent information for prospective franchise owners to do their due diligence before making an investment. The rule was updated a little over a decade ago following a 10-year-long, constructive, consensus-based process that included regulators, franchise brands and franchise owners. That process worked, and the Rule has driven franchisors to increase transparency into their systems' financial performance disclosures, with 66% of franchisors disclosing revenue information in their Item 19s in 2017 compared to only 52% in 2014.¹ By requiring clear and consistent disclosure of information at the outset of all franchise relationships, and through its evenhanded federal application, the existing rule allows for better-performing franchisors and franchisees to succeed together.

The franchise community has consistently supported regulatory policies designed to ensure that prospective franchisees receive relevant information about their proposed franchise purchase sufficiently in advance of their purchase to permit them the appropriate time, as well as the pertinent information, to make a well-informed decision. To that end, we believe the current rule supports a proper balance between the legitimate disclosure needs of prospective franchisees and the compliance burdens and costs, borne by both franchisors and franchisees. It has created a more efficient franchising system, where expectations are clear, disclosures are transparent, and all franchise systems are required to comply with its requirements.

For these reasons, we strongly affirm a continuing need for the rule substantially in its current form, which represents the franchise sector's interests and desire for thoughtful, consistent, and fair regulation.

¹ FRANdata 2017 Financial Performance Representation Study, April 2017.

Sincerely,

1Huddle	Church's Chicken	Five Star Painting®
7-Eleven	Cinnabon	FlannelJax's
Archadeck Outdoor Living	City Wide Facility Solutions	Floor Coverings International
Aerowest Franchises	Clear Summit Group	Focus Brands
Aire Serv®	Closet & Storage Concepts	FranNet, LLC
Allegra Marketing Print Mail	College Pro	Fresh Sweeps Chimney and Air Duct
Alta Mere	Color Me Mine	FRSTeam, Inc.
Always Best Care Senior Services	ComForCare Home Care	Fully Promoted
American Speedy Printing Centers	Conserva Irrigation	Fuzz Wax Bar
Anago Cleaning	Cookies by Design, Inc.	Glass Doctor®
Any Lab Test Now	Coverall	Goldfish Swim School Franchising, LLC
ARCpoint Labs	Creative Colors International, Inc.	Great Clips, Inc.
Assisting Hands Home Care	Culver Franchising System, LLC	Griswold Home Care
At Your Side Home Care	Decorating Den Interiors	Hand and Stone
Athletic Republic	Domino's Pizza	Hilton
AtWork Group	Dryer Vent Wizard	Home Instead
Auntie Anne's	East Coast Wings + Grill	HomeTask, Inc.
Bambu Franchising LLC	EatGatherLove	Hooters
Blue Moon Estate Sales	Ecomaid	Hot Feet Fitness
BrightStar Care	Egg N' Joe	HouseMaster
California Closets Company	Elmer's Breakfast·Lunch·Dinner	Hungry Howie's Pizza and Subs Inc.
CarePatrol	Experimax	i9 Sports Corporation
Caring Senior Service	Farrell's eXtreme Bodyshaping	Image360
Carvel	FASTSIGNS	Instant Imprints
CertaPro Painters	Figaro's Italian Pizza, Inc.	Insty-Prints
Chicken Salad Chick	Firehouse of America, LLC	InterContinental Hotels Group
Choice Hotels International, Inc.	Fish Window Cleaning Services, Inc.	InXpress Americas
Chop Stop Inc.		Jamba

Jon Smith Subs	Paisano's Franchise System, Inc.	Stratus Building Solutions
Keystone Insurers Group, Inc.	Paul Davis Restoration, Inc.	SuperGreen Solutions
Kid to Kid Franchise System, Inc.	PickUp USA Franchise Company	SuperSlow Zone
KKP	Pigtails & Crewcuts	TeamLogic IT
Lawn Army	Pillar To Post Inc.	The Automotive Outfitters
Lawn Doctor	Pinch A Penny, Inc.	The Great Greek
LearningRx	PIP Printing	The Grounds Guys®
LiNK Staffing Services	Pizza Factory, Inc.	The Junk Luggers
Massage Heights	Primrose School Franchising Company	The Lash Lounge
McAlister's Deli	ProTect Painters®	The Max Challenge
Metal Supermarkets	PuroClean	The UPS Store, Inc.
Milex Complete Auto Care	Qualicare	The Woodhouse Day Spas
Moe's Southwest Grill	Rainbow International®	Toppers Pizza
Molly Maid®	Real Property Management®	Transworld Business Advisors
More Space Place	Recruiting in Motion	Tuffy Tire & Auto Service
Mosquito Hunters	Resource Operations International	Tutor Doctor
Mosquito Joe®	Retro Fitness	TWO MEN AND A TRUCK®
Mr. Appliance®	RSVP	Uniglobe Travel International LP
Mr. Electric®	Schlotsky's	Uptown Cheapskate, LLC
Mr. Handyman®	Schmizza International, Inc.	Venture X
Mr. Rooter®	Scooter's Coffee, LLC	Vitality Bowls
Mr. Transmission	Servpro Industries, LLC.	Window Genie®
Multistate Transmissions	ShelfGenie	Wings Etc Inc
NerdsToGo	Signal Graphics	Wisdom Senior Care
Network Lead Exchange	Signarama	WOB Bar & Kitchen
Nextaff	Signs By Tomorrow	WSI Digital
Nick-N-Willy's Pizza	Signs Now	Wyndham Hotels & Resorts, Inc.
Office Evolution	Sir Speedy Printing	Yellow Van Handyman
Outdoor Lighting Perspectives	SmartVIEW Window Solutions	You've Got Maids
Outdoor Living Brands	Sola Salon Studios	
Oxi Fresh Carpet Cleaning		
Painting With A Twist		