

I am writing to you today as a small housing provider in Fairfield, Maine. I am concerned about LD 1552 and urge you to oppose it. This bill contains overly broad language that could severely impact the ability of small housing providers like myself to determine fair market rent using readily available public information.

Determining a fair market rent necessitates understanding current local conditions. For many small landlords, this typically involves accessing and analyzing publicly available information. Such information might include data published by housing authorities regarding area rent levels, comparable property listings found on widely used online platforms, or other public sources reflecting the current market. The goal is simply to set a rent that is reasonable and competitive based on objective, accessible data.

My concern lies with the extremely broad definition of "algorithmic device" in this bill: "a device that uses one or more algorithms to perform calculations of data, including data concerning local or statewide rent amounts...for the purpose of advising a landlord." Could consulting online rental listing aggregators – platforms which inherently use algorithms to sort and display data – be construed as using a prohibited device under this definition? Could performing basic calculations, perhaps even with spreadsheet software, on publicly sourced rent data to find an average be interpreted as falling under this ban? This legislation creates significant uncertainty about what methods of basic market research are permissible, potentially chilling routine and necessary business practices for small operators.

Furthermore, this bill focuses on the *tool* rather than the *outcome*. The focus should be on preventing genuinely unfair or collusive practices, which existing laws address, not on prohibiting methods of analyzing public market data. If common methods for analyzing publicly available data are deemed illegal, it will significantly hinder the ability of small landlords to operate efficiently and set rents accurately based on current conditions. This could lead to less informed pricing decisions and create an undue burden, particularly for those of us managing properties alongside other responsibilities.

It also raises a question of fairness. Why is the legislature considering such a broad prohibition targeting landlords – potentially impacting small operators using basic analysis of public data – when sophisticated pricing algorithms appear common in other major industries? One often observes large retail corporations, such as home improvement stores, pricing products and services very closely across competitors and locations. Is that not likely driven by complex algorithms? Why single out housing providers, and potentially the smallest ones, with such sweeping restrictions on analytical tools?

This bill feels like a misdirected effort that risks penalizing responsible small landlords who need access to public information and basic analytical methods to determine appropriate market rents. It doesn't address the root causes of housing costs and creates unnecessary hurdles and legal risks for small businesses due to its vague and overly broad definitions.

I urge you to consider the practical implications for small housing providers across Maine and vote against LD 1552. Please focus on addressing the underlying housing challenges and

enforcing laws against genuinely unfair practices, rather than banning tools essential for basic market analysis.

Regards,

Justin Giroux

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