



**MEMORANDUM IN OPPOSITION  
S2505**

The Rent Stabilization Association of New York City represents 25,000 diverse owners and managers who collectively manage more than one million apartments in every neighborhood and community throughout the City. We thank the Committee for giving us the opportunity to submit this memorandum in opposition of S2505, which would create a statewide residential registry for rental units and require owners to register units annually.

The bill would require owners to register units annually in a statewide residential rental registry, and this information, along with data provided by local government and code enforcement agencies, would be used to create an online searchable database available to the public. Included among the registration mandates is information on the building, all owners' names, the address of each registered property owned by each owner, the number of units on the property, the number of rooms, accessibility features, rent regulation status, the current number of outstanding violations, the number of findings of harassment currently on record with any code enforcement agencies, the number and types of active violations and orders issued by any code enforcement agencies and the details thereof, the date the information was updated and the date the portfolio is generated.

The bill specifically exempts from registration those owners who are required to register with a local government whose system allows for a public online searching of residential rental units in a manner that complies with the state. While this seemingly would exempt New York City owners from a duplicative registration requirement, as the City currently requires the owners of rental units to register in a city-based system, the information that is required here is not identical to what the city requires - such as the requirements that all owners' names, addresses and phone numbers be listed and that the address of each registered property owned by each owner be disclosed as well as the number of rooms, bathrooms and bedrooms of a property and its accessibility features - and, therefore, would require owners in the city to register both with the city and the state. In addition, some of the information to be aggregated for the portal, while already required by the state, currently is not public information, such as rent regulated status.

This duplicative registration requirement adds another regulatory requirement on property owners and subjects them to another possible penalty for failing to comply with largely unneeded mandate.

Accordingly, the RSA opposes this bill.