



March 11, 2026

Via electronic mail

The Honorable Joseph J. Solomon, Jr
Chair, House Corporations Committee
Rhode Island House of Representatives
State House, Room 230A
82 Smith Street
Providence, RI 02903

RE: House Bill 7849 (COMMERCIAL LAW -- GENERAL REGULATORY PROVISIONS -- FILING OF TRADE NAME - Creates the surveillance pricing and online retailing act that would prohibit algorithmic price increases for online purchases.)

Dear Chair Solomon, First Vice Chair O'Brien, Second Vice Chair Caldwell and Members of the Committee:

The Self Storage Association (SSA) appreciates the opportunity to submit these comments and this requested clarification to HB 7849 as the committee considers the legislation.

By way of background, in self storage the operator and consumer have a commercial landlord-tenant relationship (*See* R.I. Gen. Laws 34-42-2(10)). A broad swath of consumers use self storage for a variety of reasons. Once a unit size is selected, a consumer signs the rental agreement, the contract / lease that governs the relationship between the operator and the tenant. All rental agreements are month-to-month tenancies that renew only upon the mutual desire of both parties. In other words, and unlike most commercial leases, consumers can simply vacate when they no longer need the space with very limited notice.

Since storage involves the rental of real property and is not a "good" or "service", the SSA assumes the intent was to exempt those transactions from the scope of the legislation. However, that is not abundantly clear from the current text. As a result, the SSA would greatly appreciate consideration of the following proposed amendment, inserting on page 2 of the bill, after line 4:

6-13.4-1

(6) "Services" has the meaning given in 6-28.1-2 and does not include the rental of real property.

The SSA greatly appreciates your consideration of our proposed amendment as you continue to refine the bill. If you have any questions, please contact Bob Jacquard at bjacquard@gmail.com. Thank you.

Respectfully submitted,

Daniel Bryant

Daniel Bryant
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Self Storage Association