

## ORLANDO OFFICE

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October 6, 2010

Members of the South Carolina Local Accommodation and Hospitality Subcommittee
Tax Realignment Committee

Re: Proposal Re Tax on Maintenance Assessments

Dear Subcommittee Members,

Please allow me to introduce myself and our company. I am Thomas Bell, Senior Vice President, Governmental Affairs for Interval International. Our company is a global timeshare exchange company which provides vacation exchange services to consumers who own timeshare interests at resorts across the world. Interval International serves a global network of more than 2,500 resorts in 75 countries and approximately 2 million members. We have been involved in the timeshare industry for over 34 years. We have a large number of members who reside in South Carolina and are pleased to bring many exchangers into South Carolina resorts every year

The purpose of this letter is to express our opposition to the changes recently proposed which would impose a tax on owners maintenance fees. As you may be aware, no other jurisdiction with the exception of Hawaii imposes such a tax. We are strongly of the belief that such a tax will have the direct result of decreasing the number persons who would otherwise purchase timeshare inventory in South Carolina.

In today's world, prospective owners of timeshare have a wide variety of locations in the continental United States from which to choose in selecting a vacation destination. There are lots of beachfront venues with spectacular resorts which rival those located in South Carolina. And while your state has much to offer, consumers today are doing their homework in an effort to save every penny.

Imposing a tax such as this will have a clearly negative effect on new sales in your state. With every state looking to grow their economy, it is difficult to understand why South Carolina would choose to impose a tax which will potentially limit growth.

We urge that you reject this proposal.

come A. Bell

Sincerely yours,

Thomas A. Bell

Senior VP Governmental Affairs