



9002 San Marco Court
Orlando, Florida 32819

October 5, 2010

To: Members of the South Carolina Tax Realignment Commission:

Fr: Robin Suarez, Vice President & Association General Counsel, Registrations & Government Relations.

Dear Commissioners,

Starwood Vacation Ownership, Inc., ("SVO") is the developer of the Sheraton Broadway Plantation resort located in Myrtle Beach. SVO Management Inc., ("SVOM"), currently manages the Sheraton Broadway Plantation resort for the benefit of our not for profit owners associations and our third party timeshare owners. SVO and SVOM are a division of Starwood Hotels & Resorts Worldwide, Inc., a fully integrated owner, operator and franchisor of hotels and resorts with internationally renowned brands such as Sheraton®, Westin®, Four Points® by Sheraton, W®, Le Méridien® and the recently announced AloftSM and ElementSM. SVO

On behalf of SVO and SVOM, I am writing to express support for retaining the current sales tax exemption for the sale, resale and exchange of timeshare interests in South Carolina. In addition, I am writing to express our strong opposition to any proposal which would impose new taxes on timeshare owners, including a tax on timeshare maintenance fees.

Imposing a tax on the exchange or maintenance fees of timeshare owners, would impose an undue burden on individuals who have committed themselves to a lifetime of vacations in South Carolina. Such increased fees would make South Carolina less competitive as a vacation ownership market. In addition, as with any resident run property, our owners associations are under pressure to keep their resort maintenance fees at a stable or even reduced level. Increased taxes on the maintenance fees will place pressure on the associations to reduce expenditures on other resort based items, such as housekeeping, food and beverage services and other services which generate jobs in the local community.

For these reasons, we urge the Commission to keep the current tax exemptions for timeshare sales, exchange and maintenance fees. Thank you for the opportunity to provide you with our position on this matter.