



April 1, 2026

Maryland Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

Re: House Bill 994: Business Regulation - Travel Services - Surety Requirement (Don't You Worry (Wurie) Act) – Oppose Unless Amended

Dear Chair Beidle, Vice Chair Hayes, and Members of the Senate Finance Committee:

On behalf of the Travel Technology Association (Travel Tech) and our members, thank you for the opportunity to submit comments regarding House Bill (HB) 994, which requires certain providers of travel services to file with the Department of Labor evidence of financial security.

Travel Tech represents the leading innovators in travel technology, including online travel agencies (OTAs), metasearch companies, travel management companies, and short-term rental platforms. Our members play a vital role in Maryland's travel and tourism ecosystem by empowering consumers, fostering a competitive marketplace, and driving economic growth across the state.

As currently drafted, HB 994 would impose financial security requirements on our members—all of whom are well-established industry leaders with strong financial standing. These companies are not at risk of insolvency and should not be subject to unnecessary regulatory burdens. We respectfully request an amendment to HB 994 to incorporate an exemption similar to Florida's Sellers of Travel Act,¹ which exempts Airlines Reporting Corporation (ARC)-appointed agencies from such requirements, and/or companies exceeding \$1 billion in revenue. ARC regulates transactions between airlines and travel agencies in the United States and other territories and provides travel agency accreditation services.

Florida's statute exempts:

*"Sellers of travel directly issuing airline tickets who have contracted with the Airlines Reporting Corporation for the most recent consecutive three years or more under the same ownership and control...and who annually certify their business activities under s. 559.9285(1)(a)."*²

¹ [Sellers of Travel / Business Services / Home - Florida Department of Agriculture & Consumer Services](#)

² [Statutes & Constitution: View Statutes: Online Sunshine](#)



ARC already conducts extensive financial oversight of these agencies, ensuring their financial stability.³ Notably, even under this exemption, agencies are still required to register, maintaining oversight without imposing unnecessary financial filing obligations.

Alternatively or additionally, we urge the legislature to simply exempt large financially stable platforms from this act by adding: "This section shall not apply to sellers of travel with global annual revenues or public market capitalization of exceeding \$1 billion dollars."

In addition, the bill's fiscal note indicates that implementing this program would impose costs on the state of Maryland that may exceed the revenue generated through registration fees. This raises further concerns about whether the proposed framework is appropriately calibrated to achieve its intended purpose. A regulatory structure that imposes new administrative burdens on both the state and industry, without a corresponding consumer protection benefit, warrants careful reconsideration.

Given these concerns, we respectfully urge the Committee to oppose HB 994 unless amended. Adopting language from Florida's Sellers of Travel Act and/or exempting companies exceeding \$1 billion in revenue would ensure that financially stable companies are not unnecessarily burdened while maintaining the bill's intent and avoiding unnecessary administrative costs for the state. We encourage Maryland to take a similarly balanced approach that supports effective and equitable outcomes.

Thank you for your attention to this important matter. We appreciate your thoughtful consideration and remain available to provide further input or participate in discussions with stakeholders.

Sincerely,

Laura Chadwick
President & CEO
The Travel Technology Association
www.traveltech.org

CC: The Honorable Adrian Bofo
The Honorable Marvin Holmes
The Honorable Kym Taylor

³ [Become an ARC-Accredited Agent](#)