

## Mayer, Daniel (RHC)

---

**From:** dhunter@smoadc.org  
**Sent:** Tuesday, February 16, 2021 1:59 PM  
**To:** Mayer, Daniel (RHC); Pair, Lauren (DHCD)  
**Cc:** rbianco@smoadc.org; Spencer, Michael T. (RHC)  
**Subject:** RE: Comments on Rulemaking.

**CAUTION:** This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Thank you and Ms. Pair very much.

Dean Hunter, CEO  
202-873-9211



----- Original Message -----

Subject: RE: Comments on Rulemaking.  
From: "Mayer, Daniel (RHC)" <daniel.mayer@dc.gov>  
Date: Tue, February 16, 2021 1:56 pm  
To: "Pair, Lauren (DHCD)" <Lauren.Pair@dc.gov>, "dhunter@smoadc.org" <dhunter@smoadc.org>  
Cc: "rbianco@smoadc.org" <rbianco@smoadc.org>, "Spencer, Michael T. (RHC)" <michael.spencer@dc.gov>

Hi Mr. Hunter,

Unfortunately the Commission can't make exceptions at this point to the formal comment deadline. I can take your comment below as submitted, but if you have anything else you'd like to add before 11:59pm, the Commission can formally consider it. You can email me directly at this address. Word document or PDF attachments are preferred but not required.

It's too early to say if a third notice of proposed rulemaking will be needed before finalizing the major overhaul that has been proposed here. But it's also our expectation that, once the rules are up to date the Commission will be able to move much more easily on any future amendments that are needed. So one way or the other, we'll look forward to hearing from you in the future.

Thanks,

**Daniel Mayer, General Counsel**  
D.C. Rental Housing Commission

441 4<sup>th</sup> St., NW, Suite 1140B-North | Washington, D.C. 20001  
(d) 202-442-7176 | (c) 202-664-4257 | (o) 202-442-8949  
[daniel.mayer@dc.gov](mailto:daniel.mayer@dc.gov)  
<http://rhc.dc.gov>



Confidentiality Notice: This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by separate e-mail and delete all copies of this message.

---

**From:** Pair, Lauren (DHCD) <[Lauren.Pair@dc.gov](mailto:Lauren.Pair@dc.gov)>  
**Sent:** Tuesday, February 16, 2021 9:49 AM  
**To:** [dhunter@smoadc.org](mailto:dhunter@smoadc.org)  
**Cc:** [rbianco@smoadc.org](mailto:rbianco@smoadc.org); Spencer, Michael T. (RHC) <[michael.spencer@dc.gov](mailto:michael.spencer@dc.gov)>; Mayer, Daniel (RHC) <[daniel.mayer@dc.gov](mailto:daniel.mayer@dc.gov)>  
**Subject:** RE: Comments on Rulemaking.

Good Morning Mr. Hunter:

You will need to contact the Rental Housing Commission to request a comment extension on the second proposed rulemaking for title 14, Housing, chapters 38-44 of the D.C. Municipal Regulations. Under the Rental Housing Act, the Commission is the sole authority for the implementing regulations. Although my office is an active participant in the review process, we do not have jurisdiction over the rulemaking.

I've copied Chief Administrative Law Judge Michael Spencer on this email, as well as the Commission's general counsel, Daniel Mayer. I recommend that you reach out to Chief ALJ Spencer for further instruction.

Thank you.

**Lauren J. Pair, Rent Administrator**

District of Columbia Department of Housing and Community Development  
Housing Regulation Administration  
Rental Accommodations Division  
1800 Martin Luther King, Jr. Avenue, S.E. | Washington, DC 20020  
(p) 202-442-9505 | (f) 202-645-5884  
[lauren.pair@dc.gov](mailto:lauren.pair@dc.gov) | <http://dhcd.dc.gov>

**Note that the District of Columbia Government is operating under a modified operations schedule from 03/23/2020-03/31/2021 with the**

**intent to deliver essential services. The agency building is closed and the Rental Accommodations Division staff is working remotely. Please check [www.dhcd.dc.gov](http://www.dhcd.dc.gov) for operations information and [www.coronavirus.dc.gov](http://www.coronavirus.dc.gov) for Covid-19 information.**



---

**From:** [dhunter@smoadc.org](mailto:dhunter@smoadc.org) <[dhunter@smoadc.org](mailto:dhunter@smoadc.org)>  
**Sent:** Monday, February 15, 2021 11:54 AM  
**To:** Pair, Lauren (DHCD) <[Lauren.Pair@dc.gov](mailto:Lauren.Pair@dc.gov)>  
**Cc:** [rbianco@smoadc.org](mailto:rbianco@smoadc.org)  
**Subject:** Comments on Rulemaking.

**CAUTION:** This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to [phishing@dc.gov](mailto:phishing@dc.gov) for additional analysis by OCTO Security Operations Center (SOC).

Hello Ms. Pair

I write to request an extension to the comment period for the Rental Housing Commission Proposed Rulemaking. Frankly, we have not had the resources to prepare comments on behalf of small rental housing providers.

Just in case an extension is not granted, I would like to formally comment on Section 3812.8 Representation below:

It is unfair and overly burdensome to require that housing providers **must** be represented by licensed attorneys. This is an administrative hearing and applicants should be permitted to have the representation of their choice, provided it does not conflict with the rules on non-attorney representation of the DC Court of Appeals. It is highly prejudicial to force providers to pay for lawyers while tenants may be represented by anyone, including the President of the Tenant Association.

I thank you for your consideration of this matter. If my comment is not submitted in the appropriate manner for consideration please inform me on how to correct any deficiencies. Please do not hesitate to contact me with any questions.

Sincerely,

Dean Hunter, CEO  
202-873-9211

