



April 3, 2026

TO: Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair  
Members of the Committee on Commerce  
& Consumer Protection

FR: Hilton Grand Vacations

RE: **HB 1946, HD2, SD1 – RELATING TO REGISTRATION OF TIME SHARES**  
**Hearing Date: April 7, 2026, at 9:25 a.m.**

Aloha Chair Keohokalole, Vice Chair Fukunaga and members of the Senate Committee,

Hilton Grand Vacations operates 13 resorts across four of Hawai'i's islands and has been an active contributor to Hawai'i's economy and local communities for more than two decades. As a leading global vacation ownership company operating in the State since 2001, Hilton Grand Vacations provides thousands of jobs, supports local vendors and small businesses, and welcomes members and guests who invest in Hawai'i through long-term vacation ownership. Hilton Grand Vacations hereby submits testimony in **STRONG SUPPORT of HB 1946, HD2, SD1 Relating to Registration of Time Shares.**

Hilton Grand Vacations strongly supports HB 1946, HD2, SD1 which seeks to streamline the time share registration process. This measure allows time share registration renewals to be deemed approved thirty (30) days after receipt of all required documents, unless the Director of Commerce and Consumer Affairs ("DCCA") issues a deficiency notice, and deems minor registration amendments approved after 60 days, unless a similar notice is provided. This change will reduce delays while maintaining consumer protections, thus helping the DCCA:

- Improve transparency for consumers,
- Reduce administrative burdens,
- Provide regulatory certainty for legitimate businesses, and
- Support a vital sector of Hawaii's tourism economy.



HB 1946, HD2, SD1 addresses a long-standing concern with the current registration and amendment approval process. Under existing law, routine renewal filings and minor amendments to timeshare plans can remain pending for years due to administrative backlogs and obtaining approvals or determining whether a renewal and amendment filings have been reviewed can be challenging.

This measure provides two reasonable and narrowly tailored improvements. First, HB 1946, HD2, SD1 allows registration renewals to be deemed approved thirty (30) days after receipt of all requirement documents. These renewals typically involve no material changes and still require full payment of renewal fees and compliance with all statutory requirements. This change simply eliminates unnecessary administrative delays for filings that are largely ministerial in nature.

Second, the bill establishes a 60-day review period for minor amendments that do not involve adding or removing inventory to an existing registered timeshare plan. If DCCA does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. Importantly, this preserves DCCA's authority to review and reject deficient filings while providing certainty and predictability for applicants.

HB 1946, HD2, SD1 is carefully crafted to improve efficiency without weakening consumer protection. The measure does not apply to initial registrations or amendments involving inventory changes. Further, HB 1946, HD2, SD1 does not reduce disclosure requirements or limit enforcement authority. Instead, it allows DCCA to focus its limited resources on substantive and higher-risk filings while ensuring consumers receive timely and accurate information.

For these reasons, we respectfully urge your committee to pass HB 1946, HD2, SD1. Thank you for your consideration of this request. We look forward to working with the legislative on this vitally important issue.

Thank you for your consideration.

Hannah Vazanna  
Executive Vice President  
Hilton Grand Vacations



April 3, 2026

Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair  
Senate Committee on Commerce and Consumer Protection  
Hawaii State Legislature

**Support for HB1946 HD2 SD1**

Dear Chair Keohokalole, Vice Chair Fukunaga and Members of the Senate Committee on Commerce and Consumer Protection,

On behalf of the Kohala Coast Resort Association (KCRA) thank you for providing us with the opportunity to provide our **SUPPORT of HB1946 HD2 SD1 Relating to Registration of Time Shares.**

Hawaii's time share industry is a significant and stable component of our visitor economy, accounting for approximately 15 percent of the state's visitor plant inventory and supporting thousands of local jobs. Many of these properties are affiliated with international brands and are relied upon by repeat visitors who invest long-term in Hawaii's communities.

KCRA supports HB1946 HD2 SD1, which will help streamline the time share registration process. This measure will allow time share registration renewals to be approved after 30 days, and deems minor registration amendments approved after 60 days, unless the Director of Commerce and Consumer Affairs issues a deficiency notice. This change will reduce delays while still maintaining consumer protections. We believe this bill will improve transparency for consumers, reduce administrative burdens on DCCA, provide regulatory certainty for legitimate businesses and support a vital sector of Hawaii's tourism economy.

HB1946 HD2 SD1 addresses concerns with the current registration and amendment approval process. Under existing law, routine renewal filings and minor amendments to time share plans can remain pending for years due to administrative backlogs. Applicants have experienced difficulty obtaining approvals or determining whether their renewal filings have even been reviewed. This has created uncertainty for developers, plan managers, and exchange agents, and has also prevented consumers from receiving the most current and accurate disclosure information.

This measure will provide two key improvements. First, HB1946 HD2 SD1 will allow registration renewals to be deemed approved more quickly. These renewals involve no material changes, still require full payment of renewal fees, and comply with all statutory requirements. Second, the bill establishes a 60-day review period for minor amendments that do not add or remove inventory. If DCCA does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. This preserves DCCA's authority to review and reject deficient filings while providing certainty and predictability for applicants.

HB1946 HD2 SD1 is crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations nor to amendments involving inventory changes. Further, HB1946 HD2 SD1 does not reduce disclosure requirements nor limit enforcement authority. Instead, it allows DCCA to focus its limited time and resources on substantive and higher-risk filings, while ensuring consumers receive timely and accurate information.

For these reasons, we respectfully urge your committee to pass HB1946 HD2 SD1.

Sincerely,

A handwritten signature in black ink that reads "Stephanie P. Donoho". The signature is written in a cursive, flowing style.

Stephanie Donoho, Administrative Director, Kohala Coast Resort Association



**LATE**

March 18, 2026

TO: Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair  
Members of the Senate Commerce and Consumer Protection Committee

FR: AMERICAN RESORT DEVELOPMENT ASSOCIATION – HAWAII (ARDA-Hawaii)

RE: **HB 1946, HD2, SD1 - RELATING TO REGISTRATION OF TIME SHARES.**  
**Hearing date: April 7, 2026, at 9:25a.m.**

Aloha Chair Keohokalole, Vice Chair Fukunaga and members of the Committee,

ARDA-Hawaii is the local chapter of the trade association for the time share industry. There are currently 98 resorts and more than 15,000 time share units throughout Hawaii. ARDA-Hawaii hereby submits testimony in **STRONG SUPPORT of HB 1946 HD2, SD1 Relating to Registration of Time Shares.** The SD1 is agreed upon by the regulator and the industry. **Both the industry and the DCCA Timeshare Office are requesting an effective date of September 1, 2026 to give the office time to prepare for implementation.**

Hawaii's time share industry is a significant and stable component of our visitor economy, accounting for approximately 15 percent of the State's visitor lodging inventory and supporting thousands of local jobs. Many of these properties are affiliated with internationally recognized hospitality brands and are relied upon by repeat visitors who invest long-term in Hawaii's communities.

ARDA-Hawaii strongly supports HB 1946 which seeks to streamline the time share registration process. This measure allows time share registration renewals to be automatically approved within 30 days after submission and deems minor registration amendments approved after 60 days unless the Director of Commerce and Consumer Affairs issues a deficiency notice. This change reduces delays while maintaining consumer protections. By reducing unnecessary regulatory delays, this bill will:

- Improve transparency for consumers,
- Reduce administrative burdens on DCCA,
- Provide regulatory certainty for legitimate businesses, and
- Support a vital sector of Hawaii's tourism economy.

HB 1946 addresses a long-standing concern with the current registration and amendment approval process. Under existing law, routine renewal filings and minor amendments to time share plans can remain *pending for years* due to administrative backlogs. Applicants have experienced difficulty obtaining approvals or determining whether their renewal filings have been reviewed. This has created uncertainty for developers, plan managers, and exchange agents, and has also prevented consumers from receiving the most current and accurate disclosure information.

This measure provides two reasonable and narrowly tailored improvements. First, HB 1946 allows registration renewals to be deemed approved upon 30 days after delivery. These renewals involve no material changes and still require full payment of renewal fees and compliance with all statutory requirements. This change simply eliminates unnecessary administrative delays for filings that are ministerial in nature.

Second, the bill establishes a 60-day review period for minor amendments that do not involve adding or removing inventory. If DCCA does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. Importantly, this preserves DCCA's authority to review and reject deficient filings while providing certainty and predictability for applicants.

HB 1946 is carefully crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations or amendments involving inventory changes. Further, HB 1946 does not reduce disclosure requirements or limit enforcement authority. Instead, it allows DCCA to focus its limited resources on substantive and higher-risk filings while ensuring consumers receive timely and accurate information.

The current SD1 represents compromise language with the Dept. of Commerce Consumer Affairs' Time Share Office that both sides agree upon. **The only change necessary and being requested from both sides is the effective date from July 1, 3000 to September 1, 2026.**

For these reasons, we respectfully urge your committee to pass HB 1946. Thank you for your consideration of this request. We look forward to working with the legislature on this important issue.

Thank you for your consideration.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Mitchell A. Imanaka  
ARDA Hawaii

April 3, 2026

Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair  
Members of the Senate Commerce and Consumer Protection Committee

Re: **HB 1946, HD2, SD1-Registration of Time Shares**

Dear Chair Keohokalole, Vice Chair Fukunaga and Members of the Committee:

Thank you for the opportunity to submit testimony **in strong support of HB 1946, HD2, SD1** which seeks to streamline the time share registration process by deeming registration renewals automatically approved within thirty days after submission to the Department of Commerce and Consumer Affairs (DCCA), and deeming minor amendments approved within sixty days after submission unless the DCCA issues a deficiency letter.. We appreciate the Legislature's ongoing commitment to improving the administrative processes governing Hawaii's timeshare industry, ultimately benefiting consumers, regulators, and developers alike.

As an active participant in Hawaii's regulatory framework, we have routinely experienced extended delays in obtaining approvals for disclosure statement revisions, registration renewals, and related amendment filings. In many instances, approvals can take months or even years to be issued creating persistent challenges across multiple filing periods.

These delays, while understandable given resource constraints and workload, have significant downstream effects:

- They hinder developers' ability to provide purchasers with the most accurate and up-to-date disclosure statements at the time of sale.
- They delay implementation of revisions to Purchase and Sale Agreements, even when such revisions strengthen consumer protections and enhance clarity.
- They create operational bottlenecks across legal, compliance, and sales teams, particularly when filings remain in prolonged "pending" status.

For these reasons, we strongly support the improvements proposed in HB 1946 HD2, SD1. The changes represent a true win-win-win for all parties involved:

**A Win for Consumers** - Consumers benefit when they receive timely, accurate, and up-to-date information. More predictable approval timelines ensure that disclosure statements and related materials reflect the latest revisions, enhancing transparency and empowering buyers to make fully informed decisions.

**A Win for DCCA** - Clearer process expectations and timelines will support the DCCA's workflow efficiency, help reduce administrative backlogs, and minimize repeated follow-up inquiries. These efficiencies would also enable the DCCA to devote more time and resources to reviewing complex or high-impact filings, including new development projects that have the potential to generate additional tourism revenue and broader economic benefits for the State of Hawaii.

A Win for Developers - Streamlined approval processes allow developers to more effectively implement regulatory updates, operational improvements, and consumer-focused revisions while maintaining strict compliance.

The proposed changes would strengthen Hawaii's regulatory structure in a manner that is positive, balanced, and beneficial to all parties. For consumers, it enhances clarity and confidence; for DCCA, it improves efficiency; and for developers, it helps ensure timely compliance and operational alignment.

For these reasons, we respectfully urge the Committee to pass HB 1946 HD2, SD1.  
Thank you for your time and consideration.

Sincerely,



Daralis Vega de Fernandez  
Director, Legal-Registration  
Travel + Leisure Co.  
[Daralis.VegadeFernandez@travelandleisure.com](mailto:Daralis.VegadeFernandez@travelandleisure.com)  
Cell: 407-433-4697



April 3, 2026

Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair  
Members of the Senate Committee on  
Commerce and Consumer Protection

**RE: HB 1946 HD2 SD1 – Relating to Registration of Time Shares**  
**Hearing date: April 7, 2026 at 9:25 AM**

Aloha Chair Keohokalole, Vice Chair Fukunaga, and Members of the Committee,

Thank you for allowing me to submit testimony on behalf of Marriott Vacations Worldwide Corporation (“MVWC”) in **STRONG SUPPORT** of HB 1946 HD2 SD1 – Relating to Registration of Time Shares. MVWC is a global leader in the timeshare industry with five resort properties in Hawaii. Timeshare resorts are an important and stabilizing part of the tourism industry, and resort development and operations provide thousands of jobs, including high paying sales and marketing jobs in the islands year after year.

HB 1946 HD2 SD1 would allow renewals of existing timeshare registrations to be considered approved upon timely filing with the DCCA. The bill would also provide that certain minor amendments to approved time share plan registrations be considered approved forty-five days after submission to the DCCA, unless the Director of DCCA finds deficiencies and sends a deficiency letter.

This bill is needed because resort developers, plan managers, and exchange agents are required to submit renewal filings on a biennial basis, yet applicants frequently experience significant delays, often waiting years for the required renewals to be approved. The delay in approving routine renewals and amendments results in consumers receiving Hawaii disclosure statements which do not contain the most current information. HB 1946 HD2 SD1 is narrowly tailored to address only routine and minor filings that do not involve inventory changes or initial registrations. HB 1946 HD2 SD1 will allow for greater administrative efficiency without diminishing consumer protections – all disclosure requirements, filing fees, and DCCA oversight authority remain intact.

HB 1946 HD2 SD1 is carefully crafted to improve efficiency without weakening consumer protections. The measure does not apply to initial registrations or amendments involving inventory changes. Further, HB 1946 HD2 SD1 does not reduce disclosure requirements or limit enforcement authority. Instead, it allows DCCA to focus its limited resources on substantive and higher-risk filings while ensuring consumers receive timely and accurate information.

The HD2 SD1 measure provides two reasonable and narrowly tailored improvements.

1. First, HB 1946 allows registration renewals to be deemed approved 30 days after delivery. These renewals involve no material changes and still require full payment of renewal fees and compliance with all statutory requirements. This provision simply eliminates unnecessary administrative delays for filings that are ministerial in nature.
2. Second, the bill establishes a 60-day review period for minor amendments that do not involve adding or removing inventory. If the Department of Commerce and Consumer Affairs (DCCA) does not issue a deficiency letter within that timeframe, the amendment is deemed approved by operation of law. Importantly, this preserves DCCA's authority to review and reject deficient filings while providing greater certainty and predictability for applicants.

By allowing DCCA to process these limited categories of submissions on an expedited track, the department can better allocate time and resources toward reviewing material amendment filings and initial registrations that warrant closer scrutiny. The practical effect should be a more efficient regulatory system where DCCA focuses on substantive reviews, developers have a more transparent timeline, and consumers receive more timely approved disclosures. For these reasons, we urge the committee to pass this bill.

Mahalo for your consideration,

Robin Suarez  
Senior Vice President & Associate General Counsel  
Marriott Vacations Worldwide Corporation