



Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW, Suite CC-5610, (Annex H)
Washington, DC 20580

March 24, 2025

Re: SFR Housing Study, P251200

Americans for Financial Reform Education Fund (AFREF) strongly supports the Federal Trade Commission's (FTC) proposed 6(b) study of large-scale single family home investors and the Commission's plan to publicly disseminate information about homes owned by "mega investors," defined as entities that own over 1,000 single family rental homes.¹ There are an estimated 446,000 such homes located throughout the country.² Creating and maintaining a publicly available national database on these homes and owners would provide invaluable information about trends, regional consolidation within the single family home rental industry and its impact on rental and home purchase pricing. Additionally, the database would be helpful to current and prospective residents, neighbors, communities, and state and local policymakers concerning the prevalence and impact of mega-investor-owned properties, as mega investors often use LLC and corporate shields to obscure their true ownership from the public.

The FTC is correct to subject the single family home rental industry to further scrutiny given recent examples of price-fixing, anticompetitive, fraudulent, and deceptive behavior to tenants. For example, last year's FTC settlement agreement with Invitation Homes confirms longstanding tenant complaints about the largest single-family landlord in the country's patterns of illegal practices, including charging deceptive junk fees, failing to provide proper maintenance, stealing deposits, and intentionally misleading tenants about the federal eviction moratorium during the pandemic, among other offenses.³ Similarly, following complaints of price-fixing by corporate landlords, the U. S. Department of Justice filed an antitrust lawsuit against rent-setting software firm RealPage, accusing the private-equity-owned firm of facilitating price fixing among the country's largest landlords.⁴ Joined by eight state attorneys general, the lawsuit argues that RealPage's rent-setting software uses

¹ Federal Trade Commission. [Agency Information Collection Activities: Proposed Collection: Comment Request](#). File No. P251200. 90 Fed. Reg. 15. January 24, 2025 at 8133 et seq.

² Goodman, Laurie et al. Urban Institute. "[A Profile of Institutional Investor-Owned Single-Family Rental Properties](#)." April. 25, 2023.

³ Federal Trade Commission (FTC). [Press release]. "[FTC takes action against Invitation Homes for deceiving renters, charging junk fees, withholding security deposits, and employing unfair eviction practices](#)." September 24, 2024.

⁴ U.S. Department of Justice et al. v. Realpage, Inc. U.S. District Court for the Middle District of North Carolina. [Case No. 1:24-cv-00710](#). August 23, 2024.

private information to raise rents — and, by extension, landlord profits — well beyond what is fair to the general public.⁵

Unfortunately, these practices are all too common within the increasingly consolidated single family home rental industry. Nationally, the presence of corporate landlords in a community has been associated with raised rents, junk fees, reduced maintenance, and increased evictions.⁶ For example, tenants at private equity-owned single-family rental homes faced pandemic-era rent hikes much higher than the national average — 8 percent annually during the pandemic compared to the 5.4 percent national average.⁷ In addition to hiking rents, mega landlords often use junk fees to further increase overall housing costs for tenants. For tenants, disputing frivolous fees is time-consuming, stressful, and costly and can trigger eviction. For example, fees and tenant clawbacks — like keeping tenants’ security deposits — generated at least \$26 million for Colony Starwood Homes (now called Starwood Waypoint Homes).⁸ Another way corporate landlords maximize profits is by skimping on repairs to the detriment of their tenants: in a 2024 settlement with the Minnesota Attorney General’s Office, HavenBrook Homes was required to put \$2.2 million into a restitution fund for the benefit of current and former tenants who experienced delayed repairs or who had a member of the home diagnosed with elevated levels of lead in their blood.⁹

Today, renters are experiencing unprecedented housing costs that are rising faster than their ability to pay them: half of all tenants spend over 30 percent of their income on rent, with 27 percent spending over 70 percent of their income on housing costs alone.¹⁰ Meanwhile, prospective homebuyers face rising home prices and a difficult interest-rate environment, putting them at a competitive disadvantage with all-cash investors.

Similarly, our lack of national-level data on the single family rental industry puts the U.S. public at a disadvantage: we need more data to understand where mega investors are buying single family homes and how their presence impacts regional home prices and rents. Anonymous ownership of residential real estate allows landlords to dodge accountability for poor housing conditions, wrongful evictions, and other abuses. With their identities obscured behind layers of anonymous shell entities, landlords have little incentive to be responsive to tenants’ needs, and tenants are often left without effective recourse in the face of deteriorating, and sometimes dangerous, living conditions. The FTC’s proposed study on mega landlords will provide a much-needed, unique dataset that will help

⁵ Ludden, Jennifer, “[RealPage Accused of Helping Landlords Collude to Raise Rent](#),” NPR, August 23, 2024.

⁶ Americans for Financial Reform: [Research Memo: New AFR Research Estimating Minimum Number of Private Equity-Owned Housing Units](#). June 28, 2022.

⁷ Clark, Patrick. “[Rent surges on single-family homes with landlords testing market](#).” *Bloomberg News*. May 7, 2021; Lerner, Michelle. “[Rents on the rise as pandemic pricing disappears](#).” *Washington Post*. June 16, 2021.

⁸ Mari, Francesca. “<https://www.nytimes.com/2020/03/04/magazine/wall-street-landlords.html>” New York Times Magazine. March 4, 2020.

⁹ Office of Minnesota Attorney General Ellison. [Press Release]. [Attorney General Ellison reaches landmark settlement with single-family rental-home landlords](#). March, 15, 2024.

¹⁰ National Low Income Housing Coalition: [Out of Reach: the High Cost of Housing](#). Accessed March 19, 2025..

us understand national and regional trends in the market while increasing accountability within the industry.

Thank you for your attention to this matter. For further discussion, please contact Caroline Nagy at caroline@ourfinancialsecurity.org.

Sincerely,

Americans for Financial Reform Education Fund