

**BCAP**RECEIVED  
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Cable Association  
of Pennsylvania**

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3012

August 28, 2014

John Mizner  
Chairman  
PA Independent Regulatory Review Commission  
14<sup>th</sup> Floor, Harrisstown 2  
333 Market St.  
Harrisburg, PA 17101

**Re: Lobbying Disclosure Registration Fee (#16-56/IRRC #3012)**

Dear Chairman Mizner,

The Broadband Cable Association of Pennsylvania (BCAP) opposes the Department of State's most recent proposal to increase the biennial registration fee for individuals and entities required to be registered under Act 134 of 2003, from \$200 to \$400.

A 100 percent increase in the biennial registration fee will lead some individuals who aren't in the Capitol on a daily basis to delay registering until the last possible minute or avoid registering completely. While this is not the intent of the law, it may be an impact.

This large increase in fees is designed to cover the costs of carrying out the Act. Is this increase in fees, far in excess of the inflation rate, justified? Are there economies of scale that can be achieved by more effective management rather than raising the fee?

BCAP urges the Department of State to reconsider the increase in the biennial registration fee. A robust democracy should encourage citizens to petition their government. Unfortunately, this fee increase will discourage citizen participation.

Sincerely,



Brian F. Barno  
VP, Government Affairs