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September 4, 2014

John F. Mizner, Esq.
Chairman
Pennsylvania Independent Regulatory Review Commission (IRRC)
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Objection to Regulation #16-56: Lobbying Disclosure Registration Fee

Dear Chairman Minzer and Commission Members:

The Pennsylvania Pharmacists Association (PPA) strongly objects to Department of State regulation #16-56 in its final form which would increase the biennial registration fee for individuals and entities required to be registered under the Lobby Disclosure Act from \$200 to \$400.

We are a small, non-profit, association with only about 2,000 members and a minimal budget. Although the Department of State has reduced the proposed fee from \$700 to \$400, increasing the biennial registration fee from \$200 to \$400 will still place smaller associations and organizations like ours at a huge competitive disadvantage compared to large organizations and corporations.

With limited resources, consider that a 100% increase in fees may limit the opportunities our association will have in voicing the issues and concerns of our members who reside all across the Commonwealth. Not only would the \$200 fee increase be detrimental to our association, it would be detrimental to our 2,000 members who rely on efforts from our association to protect their interests.

Currently, we pay for three licenses, one as an entity and one for our CEO and our Government Relations Manager. This means that a small association like ours will need to budget for \$1200 to cover for its lobbying registration fees. With a small annual budget, \$1200 will be an excessive price to pay to lobby. Department of State regulation #16-56 will significantly impact the finances of our association and other small associations across the Commonwealth. Tough decisions may be forced to be made on whether or not the increased fees are sustainable long-term.

PPA objects to the proposed increase particularly of such a significant amount, and urges the IRRC to reject regulation #16-56 as it will be burdensome and place competitive disadvantages on small associations in Pennsylvania.

Sincerely,

Patricia A. Epple, CAE
CEO

Don L. Smith
Government Relations Manager

CC: IRRC Commission Members
Caroline A. Bailey, Assistant Counsel, Department of State
Fiona E. Walmarth, Director of Regulatory Review
James M. Smith, Regulatory Analyst