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September 17, 2014

John Mizner, Esquire, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED
IRRC
2014 SEP 18 AM 8:07

Dear Chairman Mizner and Colleagues:

I write to share thoughts about the proposal by the Department of State to increase the registration fee under the Lobbying Registration and Reporting Law. The current version dramatically slashes the fee originally proposed by the Department. While the revised hike is substantial, I don't find it to be unreasonable given the unrelenting pressure on the General Fund.

While I am not a lobbyist, nor do I anticipate becoming one, I am not dismissive of the concerns raised by some in the profession of lobbying who bemoan that the revised proposal is excessive. Some will, no doubt, feel the impact and a few principals may even decide to back away from the notion of formal representation in the public policy development process.

The income from the proposed registration fee increase will still leave a need for continuing General Fund contribution to offset the Department's costs in performing its statutory duties and that is not unreasonable given the salutary benefits of transparency.

The Department, in its current proposal, has attempted to find a balance among the competing considerations. From my vantage point, the Department has achieved that result and there is no compelling reason for the Commission to disapprove the revised proposal to boost the fee.

The foregoing reflects only my personal view and is not indicative of any position on the part of Conrad O'Brien, P.C. Thank you for your consideration of these comments.

Sincerely,


Stephen MacNett

SMC/ild

cc: Secretary Carol Aichelle
Senator Lloyd Smucker
Senator Matthew Smith
Representative Daryl Metcalfe
Representative Mark Cohen

2014 SEP 17 AM 11: 18

September 16, 2014

EMBARGOED MATERIAL

James M. Smith
Fiona Wilmarth
PA Independent Regulatory
Review Commission
333 Market Street
Harrisburg, PA 17101

Re: Proposed DOS Regulation #16-56 (IRRC #3012)

Dear Mr. Smith and Ms. Wilmarth,

As a Pennsylvania Association for Government Relations member, we fully support the comments made by our President, Gabreille Sedor.

We continue to oppose the proposed increase from \$200 to \$400. This increase would make Pennsylvania's registration fee among the most expensive in the nation. As a lobbying organization we agree to the code of conduct which encourages high standards of personal and professional conduct among all lobbyists.

We understand that the Lobbyist Disclosure Act under section 13A08(j) allows the Department to raise the fee to cover the costs of carrying out the act, however, we have not seen to date whether all expenses related to carrying out the act are truly necessary. We question whether the Department of State has the ability to minimize its own costs and overhead before passing on such a burdensome fee to the regulated community.

Thank you for your time and ask that you consider the comments and in depth material submitted by the PAGR organization.

Sincerely,



Patricia A. Mackavage
Harrisburg Executive Director
300 North Second Street, Penthouse
Harrisburg, PA 17101



PENNSYLVANIA
PARTNERSHIPS
FOR CHILDREN

3012

RECEIVED
IRRC

2014 SEP 16 PM 4: 46

116 Pine Street, Suite 430
Harrisburg, PA 17101-1244

September 15, 2014

EMBARGOED MATERIAL

Mr. John Mizner, Esq.
Chairman
Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17101

Dear Chairman Mizner:

I am writing to provide comments on the final-form regulation #16-56, which amends 51 Pa. Code, Chapter 53, § 53.1 to increase the biennial registration fee for individuals and entities required to be registered under the Lobbying Disclosure Act. The proposal increases the fees from \$200 to \$400 beginning in the 2015-16 registration period.

Pennsylvania Partnerships for Children (PPC) is an independent, statewide and non-profit organization with a small staff of twelve people. PPC takes the Lobbying Disclosure Act very seriously and complies fully with its requirements. While we appreciate the Department of State reducing the proposed increase, a 100 percent fee increase is still burdensome and cost prohibitive for small organizations such as ours, especially with only a few months to prepare for such a large new cost. I urge the Independent Regulatory Review Commission to oppose the final-form regulatory proposal on September 18th.

There needs to be a degree of reasonableness in considering these fees. Simply doubling the proposed fee every few years does not allow small organizations, such as ours, to accurately project in long-term budgeting. Further, the diversity of organizations that seek to advocate before state policymakers requires recognition that cost-prohibitive registration fees could contradict the spirit of Pennsylvania's lobbyist disclosure law.

PPC appreciates the opportunity to provide comments on the biennial registration fee proposal. We will continue to comply with the law to the highest standard possible in the spirit of transparency. Thank you.

Sincerely,

Joan Benso
President and CEO