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October 17, 2014

Mr. James Smith  
Ms. Fiona Wilmarth  
Independent Regulatory Review Commission  
333 Market St 14<sup>th</sup> Floor  
Harrisburg, PA. 17101

Department of State, Regulation #16-56 IRRC #3012

Dear Mr. Smith and Ms. Wilmarth: I am again writing in response to the revised final regulation proposed by the Department of State, Regulation #16-56 IRRC #3012, increasing the lobby registration tax to \$300.00.

The "right to petition government for a redress of grievance" in Pennsylvania, regardless of the petitioner's status unfortunately was violated with the passage of the Lobby Disclosure Act when it established the initial registration fee of \$100.

Last month, the Commission rightly rejected the Departments second attempt at further impacting this right. Again, the Department seeks an increase that will further compound the injury to this fundamental precept.

As the Commission pointed out in it's rejection last month, "...we find that the department has not sufficiently established that the \$400 fee will not hinder "the right to petition those invested with the powers of government for redress of grievances." I would submit that they have again failed. As I stated above, our right to petition was violated with the passage of the Act and the initial imposition of the tax. To think that an acceptable increase can be found that will not have an adverse impact on a citizen or group is a fool's errand. As has been pointed out by other commenter's, the department administers a variety of laws and programs that benefit transparency and the publics right to know that are supported by the General Fund. As others and I pointed out last month, the Administration has the benefit of at least \$900,000 derived from the tax imposed on lobbying services. The department makes no mention of this tax as an alternative funding source; they make no substantive commitment to increase the thresholds for reporting. They do, however, strongly suggest that an attempt will be made down the road for another to increase this tax.

I respectfully ask the Commission to reject the regulation.

Thank you

Frederick C. Brown