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STATE GOVERNMENT COMMITTEE
CHAIRMAN

House of Representatives
Commonwealth of Pennsylvania
Harrisburg

3012

June 26, 2013

Caroline Bailey, Assistant Counsel
Department of State
210 North Office Building
Harrisburg, PA 17120

Re: Proposed Rulemaking – Increase in Lobbying Disclosure Registration Fee (16-56)

Dear Ms. Bailey:

We write today to share comments regarding the Department of State's proposed rulemaking, which proposes to increase the biennial lobbying registration fee from \$200 to \$700. Given the magnitude of the proposed fee increase, we believe that it is important to exercise the State Government Committee's oversight role under the Regulatory Review Act.

Quite simply we believe that the proposed fee increase is excessive. The proposed regulation, if approved and promulgated, would represent a 250 percent increase in the fee which is paid by lobbyists, lobbying firms and the organizations and individuals they represent as a condition of lobbying the legislative and executive branches of their government. When the General Assembly enacted the Lobbying Disclosure Act we gave the Department the authority to adjust the biennial registration fee if needed to cover the costs of carrying out the provisions of the Act. However, would legislators at that time have envisioned this provision of law being used to propose a 250 percent fee increase?

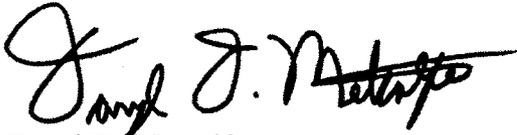
The Department's regulatory analysis form for this regulation estimates that the fee increase may cause as many as one-third of the individuals and entities currently registered to not seek registration when the proposed increased fees go into effect. This information suggests that the excessive magnitude of the proposed fee increase will have a real and practical impact on individuals, businesses and other organizations that may desire to lobby their government.

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As members of the standing committee that has oversight regarding the Lobbying Disclosure Law and Department of State regulations, we transmit this letter to you and urge you to consider withdrawing Lobbying Disclosure Registration Fee (16-56). On June 26, 2013 the members of the State Government Committee voted to approve a motion to adopt this letter as Committee comments regarding the above mentioned regulations and to transmit the comments to the Department of State.

Sincerely,

A handwritten signature in black ink, appearing to read "Daryl D. Metcalfe". The signature is stylized with a large initial "D" and a long horizontal flourish extending to the right.

Daryl D. Metcalfe
Chairman
House State Government Committee

cc: Independent Regulatory Review Commission