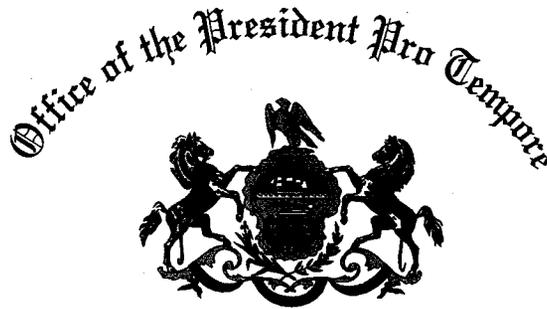


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July 17, 2013

Pennsylvania Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Commission Members:

I offer this letter to add further input on the issue of increasing lobbying registration fees from \$200 to \$700. I have been directly involved with lobbying registration and reporting laws for over 15 years. I was not going to comment regarding the decision-making process until I recently read the July 11th Capitolwire story on the subject.

When the Lobbying Law was being developed back in 2006 there was little or no talk about setting the registration fee at an amount that would cover the entire cost of administering the program. There was much discussion that the fee should be substantial enough to be a significant component of the full expense. There was also an acknowledgment that the fees may have to be adjusted over time.

I am not struck by some sort of outrage, or even concern, that the state may utilize taxpayer funds in part to administer the program. It is a state law, administered by state officials, subject to state sanctions. The public is getting a significant return on investment by this program being in place. Any person has immediate access to a database in order to ascertain who is representing whom in Harrisburg and how much money is being spent on any such effort.

And while the spokesperson for the Department of State in the recent Capitolwire article is out defending a populist opinion, let a few additional facts be known. One, the reason for the \$1.8 million price tag is in part due to the department's incompetency over the years. The department has selected vendors to build the electronic system for the registering and reporting which have led to overruns in cost and significant delays. In fact, the version currently being utilized is still flooded with errors and confusing data....six years later. I cannot emphasize enough the inept workmanship that has occurred over the years in the development of the electronic interface.

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Independent Regulatory Review Commission
July 17, 2013
Page 2

Further, the spokesman for the Department of State has misinterpreted the law, which is a bit unsettling since that is one of the agencies which is empowered to enforce the act. Lobbyists have a responsibility to register with the department if in any quarter he or she spends \$2,500. His argument that the threshold of spending is \$10,000 annually is false. There are occasions (perhaps often) when a small lobbying effort surpasses the threshold of \$2,500 in a quarter but does not occur in the remaining nine months of the year. That lobbyist or principal would still be burdened to register and pay the corresponding fee.

I would urge the Independent Regulatory Review Commission to reject the fee increase. It is simply too onerous on small lobbying efforts. Further, until the department substantiates that it is no longer inappropriately spending resources for the administration of this program, no increase is warranted.

Thank you for considering my view.

Sincerely,

A handwritten signature in black ink that reads "Drew Crompton". The signature is stylized, with a large, sweeping "D" and "C" that frame the name.

Drew Crompton
Counsel to Senator Scarnati