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B.J. ALAN COMPANY

Distributors of Phantom® and Wolf Pack® Brand Fireworks

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June 12, 2013

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

RE: Biennial Registration Fee Proposed Increase – 43 Pa.B. 3009

Ms. Bailey:

I am writing to you today concerning B.J. Alan Company's objection to the new biennial registration fee proposed in Pennsylvania Bulletin 43 Pa.B. 3009.

~~B.J. Alan Company operates seven retail fireworks showrooms which sell state legal, 1.4G consumer fireworks to customers both residing in Pennsylvania and outside of the state. As you may know, the fireworks industry is a heavily regulated industry and because of this, we employ lobbyists in many states, including Pennsylvania, to lobby on our behalf.~~

The proposed fee increase adds another level of burden to an already burdensome Lobbying Disclosure process. The increase more than triples the current fee paid by registrants, with no guarantee that the fee will not soon be raised again.

In addition to the proposed fee increase, there is another aspect of Pennsylvania's lobbying registration system which we find to be somewhat duplicative and burdensome on any lobbyist employer. When a lobbyist firm hires a new lobbyist, a notice must go out to the employer and the employer (as well as the lobbyist firm) must amend their registration to include the new lobbyist, regardless of whether that lobbyist has or will participate in any lobbying efforts on behalf of the lobbyist employer. This creates an unnecessary extra step in the process, with no real benefit to either employer or lobbyist firm and one that we have not seen in any other state.

While we have and will continue to follow this rule, we would urge you to change the current policy as well as forego any increase to the fees currently paid by registrants.

Sincerely,



RAECHELLE K. SPEAKER
Corporate Counsel

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