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June 24, 2013

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

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DEPARTMENT OF STATE
BUREAU OF CEI

RE: Objection to Proposed Increase in Lobbying Disclosure Act Registration Fee

Dear Ms. Bailey:

The Pennsylvania Pharmacists Association (PPA) strongly objects to the proposed increase to the biennial registration fee for individuals and entities that are required to register under the Lobbying Disclosure Act. We are a small, non-profit, association with only about 2,000 members and a minimal budget. Increasing the biennial registration fee from \$200 to \$700 will place smaller associations and organizations like ours at a huge competitive disadvantage compared to large organizations and corporations.

With limited resources, consider that an increase in fees may limit the opportunities our association will have in voicing the issues and concerns of our members who reside all across the Commonwealth. Not only would the proposed fee increase be detrimental to our association, it would be detrimental to the over 16,000 licensed pharmacists in Pennsylvania who rely on efforts from our association to protect their interests. Currently, we pay for three licenses, one as an entity and one for our CEO and our Government Relations Manager. We consider the current \$750 total registration expensive and find it difficult to fathom jumping to \$2100!

Although the proposed regulation states that it "should not have other adverse fiscal impact on the private sector, the general public, etc..." please consider that the regulation will significantly impact the finances of our association and other small associations across the Commonwealth. Tough decisions may be forced to be made on whether or not the increased fees are sustainable long-term.

An increase of over 250 percent would give Pennsylvania one of the highest registration fees in the country, which could drive individuals away from our state. PPA objects to the proposed increase particularly of such a significant amount, and begs you to consider the burden and competitive disadvantage you will place on small associations in Pennsylvania.

Please contact us at pepple@papharmacists.com or dsmith@papharmacists.com should you have any questions or concerns.

Sincerely,

Patricia A. Epple, CAE
CEO

Don L. Smith
Government Relations Manager