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Post Office Box 116, Harrisburg, PA 17108-0116 • (717) 939-1900 • (717) 939-7900 fax • www.pagr.org

June 25, 2013

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

Re: Proposed Rulemaking 51 Pa Code Chapter 53, Biennial Filing Fee – Published in the June 1, 2013 edition of the *Pennsylvania Bulletin*

Dear Ms. Bailey,

Thank you for the opportunity to provide comments on the above-referenced rule which proposes to increase the biennial registration fee for individuals and entities required to be registered under Act 134 of 2006 from \$200 to \$700.

The Pennsylvania Association for Government Relations (PAGR) cannot support this 250% increase which would make Pennsylvania's registration fee among the most expensive in the nation.¹

PAGR's members include contract lobbyists as well as government relations professionals who support corporations and non-profit entities. Our members agree to a code of conduct which encourages high standards of personal and professional conduct among all lobbyists.

PAGR supports transparency and compliance with the Lobbyist Disclosure Act. However, such a dramatic increase creates a disincentive for citizens to engage in the democratic process with Pennsylvania lawmakers and members of the Administration. We do not believe the Department of State intends to silence organizations or causes who are unable to afford the additional costs of compliance, but this could be the effect of such an increase.

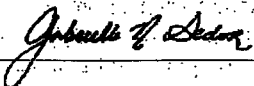
We understand that the Lobbyist Disclosure Act under section 13A08(j) allows the Department to raise the fee to cover the costs of carrying out the act. But we question whether all expenses related to carrying out the act are truly necessary. Are there ways the Department could minimize its own costs and overhead before passing on such a burdensome fee to the regulated community?

Currently, the Department audits registrations and expenses of individual lobbyists, principles and entities, however, there is significant overlap within these activities. PAGR respectfully requests a meeting with the Department of State to discuss ways in which the audit process could be improved, possibly reducing the costs related to carrying out the act.

In closing, PAGR, the professional association for lobbyists in Pennsylvania, asks the Department to reconsider the increase to the biennial registration fee as it will create barriers to transparency; will make compliance with the Lobbyists Disclosure Act more of a burden for smaller entities, particularly nonprofits; and will restrict the voices of Pennsylvanians who may opt not to exercise their abilities to communicate with legislators because fees are beyond their reach.

Thank you for considering our comments and recommendations. Please do not hesitate to contact me if you would like to discuss PAGR's comments further.

Sincerely,


Gabrielle Sedor
President
PAGR

¹ <http://www.ncsl.org/legislatures-elections/ethicshome/50-state-chart-lobbyist-registration-requirements.aspx>