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**Wanner
Associates**
Dedicated to Your Success

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June 27, 2013

John D. Wanner, CAE
President

Ted Mowatt, CAE
Senior Associate

Alex Rahn
Senior Associate

Linda Rhinehart
Senior Associate

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

Dear Ms. Bailey,

In reference to the above proposed rulemaking, we would like to provide comments related to the increase in the biennial registration fee for lobbyists, lobbying firms, and principals. Thank you for the opportunity to express our concerns.

Wanner Associates has the unique position of being both a lobbying firm and an association management firm. This allows us to see this issue from the viewpoints of both the lobbying side and the principal side of lobbying disclosure. We would like to express our misgivings on the proposed \$500 increase in registration fees from both these viewpoints.

During the economic downturn, many associations have far less revenue to dedicate to advocacy. Some have dropped their lobbying efforts or decided to scale back. The lobbying industry as a whole has been impacted by the state's economic woes and it is unreasonable to add to that impact by increasing the cost of the lobbying registration fee by 250%. In the case of lobbying firms such as Wanner Associates, that 250% increase is compounded by the fact that both the lobbying firm and all individual lobbying employees must be registered.

As an association management firm, Wanner Associates provides all management services for a number of smaller nonprofit associations. These smaller nonprofit associations have also felt the impact of the economic downturn and are still feeling it today. Others are still budgeting for lobbying projects, but are constantly forced to look at ways to make their budget balance. A 250% increase in the cost of their principal registration could very well be enough to force them to drop their lobbying efforts.

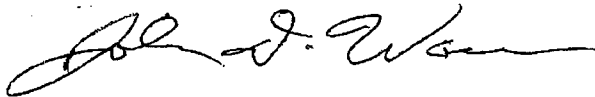
This would deprive them of a needed voice at the Capitol as there are constantly issues being brought forth in legislation and rulemaking that directly impact these nonprofit associations and their members. The association's voice at the Capitol is a major benefit of membership and, if it were taken away, these smaller nonprofits would see more and

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more losses in membership as members too must determine the best way to spend their hard earned dollars.

Wanner Associates feels that a \$500 increase in the registration fee would be detrimental to both the lobbying industry in Pennsylvania and the nonprofit association industry, both of which are still trying to recover from the economic problems of the State over the last 5 years. We ask that the Department reconsider this increase. Perhaps the correct answer to increased costs of administering the lobbying registration and disclosure system would be to try to find ways to decrease costs by simplifying the reporting and auditing system rather than increasing fees. Thank you again for this opportunity to express our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Wanner". The signature is fluid and cursive, with a large initial "J" and "W".

John D. Wanner
President
Wanner Associates, Inc.