

SEP-17-2014 WED 08:25 AM

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
SEP-17	08:25 AM	97871734	20"	2	FAX TX	OK	397	

TOTAL : 20\$ PAGES: 2

Phone: (717) 783-5417
Fax #: (717) 783-2664
E-Mail: irrc@irrc.state.pa.us
Website: www.irrc.state.pa.us

To: Carol Aichele, Secretary
Agency: Department of State
Phone: 787-6458
Fax: 787-1734
Date: 09/17/14
of Pages: 2

RE: Department of State's Regulation #16-56 (IRRC #3012)

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive, during the 48-hour blackout preceding our public meeting, within 24 hours of our receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

TRANSACTION REPORT

SEP-17-2014 WED 08:33 AM

FOR:

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
SEP-17	08:32 AM	97725471	**' **"	0	FAX TX	BUSY	398	

TOTAL : OS PAGES: 0

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Lloyd Smucker, Chairman
 Agency: Senate State Government Committee
 Phone: 787-6535
 Fax: 772-5471
 Date: September 17, 2014
 # of Pages: 2

RE: Department of State's Regulation #16-56 (IRRC #3012)

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

TOTAL : 22S PAGES: 2



2012

RECEIVED
IRRC

2014 SEP 16 PM 4: 46

116 Pine Street, Suite 430
Harrisburg, PA 17101-1244

September 15, 2014

EMBARGOED MATERIAL

Mr. John Mizner, Esq.
Chairman
Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17101

Dear Chairman Mizner:

I am writing to provide comments on the final-form regulation #16-56, which amends 51 Pa. Code, Chapter 53, § 53.1 to increase the biennial registration fee for individuals and entities required to be registered under the Lobbying Disclosure Act. The proposal increases the fees from \$200 to \$400 beginning in the 2015-16 registration period.

Pennsylvania Partnerships for Children (PPC) is an independent, statewide and non-profit organization with a small staff of twelve people. PPC takes the Lobbying Disclosure Act very seriously and complies fully with its requirements. While we appreciate the Department of State reducing the proposed increase, a 100 percent fee increase is still burdensome and cost prohibitive for small organizations such as ours, especially with only a few months to prepare for such a large new cost. I urge the Independent Regulatory Review Commission to oppose the final-form regulatory proposal on September 18th.

There needs to be a degree of reasonableness in considering these fees. Simply doubling the proposed fee every few years does not allow small organizations, such as ours, to accurately project in long-term budgeting. Further, the diversity of organizations that seek to advocate before state policymakers requires recognition that cost-prohibitive registration fees could contradict the spirit of Pennsylvania's lobbyist disclosure law.

PPC appreciates the opportunity to provide comments on the biennial registration fee proposal. We will continue to comply with the law to the highest standard possible in the spirit of transparency. Thank you.

Sincerely,

Joan Benso
President and CEO