



April 14, 2015

The Honorable Bob Goodlatte
Chairman
House of Representatives
Judiciary Committee
Washington, DC 20515

The Honorable John Conyers, Jr.
Ranking member
House of Representatives
Judiciary Committee
Washington, DC 20515

RE: Markup of H.R. 1759, the All Economic Regulations are Transparent Act of 2015 (ALERT Act)

Dear Representative:

The Coalition for Sensible Safeguards (CSS), an alliance of over 150 labor, scientific, research, good government, faith, community, health, environmental, and public interest groups, strongly opposes H.R. 1759, the All Economic Regulations are Transparent Act of 2015 (ALERT Act), which will be considered by the Committee this week.

We are particularly concerned with the provision contained in Section 653(a) that would delay important rules, essential to protecting the health, safety, and welfare of the American public, until six months after information supplied by agency heads is posted on the Internet by the Administrator of the Office of Information and Regulatory Affairs (OIRA), unless such rules meet certain limited exemptions. As a result of this requirement, the benefits of critically needed regulations - whether measured in lives saved, environmental damage averted, or money saved - would be put on hold unnecessarily for six months or longer. This delay amounts to a six-month regulatory moratorium, which is added to the often lengthy period of several years required for developing and finalizing these regulations. Such delays could extend well beyond that initial six-month period should the OIRA Administrator fail to post the required information in a timely manner.

In addition, the reporting requirements mandated by the bill amount to little more than wasteful busy-work for chronically under-resourced agencies. Much of the information required for monthly submission by agency heads on proposed or finalized regulations is duplicative of information already provided via the Regulations.gov website.

With respect to the information required under Section 651(2)(B) regarding the cost of proposed rules, it is unclear whether the dollar categories relate to annual or cumulative costs. Of particular concern is the absence of a requirement for similar information regarding rule benefits. This bill's one-sided focus on regulatory costs provides a highly distorted picture of the value of critical safeguards that all Americans depend on. If this bill was truly about improving regulatory transparency, it would require that the public is provided with information on the many lives saved by health and safety regulations or how sensible financial rules can prevent another

economic meltdown. By focusing exclusively on regulatory costs, this bill gives the misleading impression that regulations are an inescapable drain on the American economy.

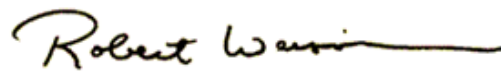
Finally, CSS has long advocated for improving the transparency of the federal rulemaking process. Unfortunately, the requirements of the ALERT Act, which would delay important public protections and waste scarce government resources, fail to provide needed transparency improvements in the regulatory review process. Instead, the reporting requirements mandated under the ALERT Act would *undermine* transparency by generating cherry-picked data that seems calculated to provide a distorted picture of the U.S. regulatory system. We are left only to conclude that the aim of this bill is to advance a politicized campaign against critical public safeguards, rather than a serious attempt to provide needed transparency about a rulemaking process that should work for the public interest instead of special corporate interests.

We strongly urge you to oppose H.R. 1759.

Sincerely,



Katherine McFate, President and CEO
Center for Effective Government
Co-chair, Coalition for Sensible Safeguards



Robert Weissman, President
Public Citizen
Co-chair, Coalition for Sensible Safeguards

The Coalition for Sensible Safeguards is an alliance of consumer, labor, scientific, research, good government, faith, community, health, environmental, and public interest groups, as well as concerned individuals, joined in the belief that our country's system of regulatory safeguards provides a stable framework that secures our quality of life and paves the way for a sound economy that benefits us all.