

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

R. BRUCE JOSTEN
EXECUTIVE VICE PRESIDENT
GOVERNMENT AFFAIRS

1615 H STREET, N.W.
WASHINGTON, D.C. 20062-2000
202/463-5310

August 6, 2015

The Honorable Robert Portman
United States Senate
Washington, DC 20515

The Honorable Angus King
United States Senate
Washington, DC 20515

The Honorable Susan Collins
United States Senate
Washington, DC 20515

Dear Senators Portman, King, and Collins:

The U.S. Chamber of Commerce, the world's largest business federation representing the interests of more than three million businesses of all sizes, sectors, and regions, as well as state and local chambers and industry associations, and dedicated to promoting, protecting, and defending America's free enterprise system, strongly applauds your introduction of the "Regulatory Accountability Act of 2015," which would modernize the 69-year old Administrative Procedure Act and improve the process federal agencies use when they write the regulations that most significantly affect the lives of all Americans.

Federal regulations must be narrowly tailored, supported by strong and credible data and evidence, and impose the least burden possible while still implementing Congressional intent. The "Regulatory Accountability Act of 2015" would reform the current regulatory process to accomplish these objectives by:

- Increasing public participation in the most costly rulemaking before they are proposed;
- Requiring agencies to select the least costly regulatory approach that accomplishes their objective unless they can demonstrate that public health, safety, or welfare requires a more costly option;
- Providing for on-the-record administrative hearings for the most costly regulations to insure that agency data is well tested and reviewed, consistent with the Information Quality Act;
- Restricting agencies' use of interim final regulations where no comments are taken before a regulation takes effect and providing for expedited judicial review of whether that approach is justified; and
- Providing for a more rigorous test in legal challenges for those regulations that would have the most impact.

The "Regulatory Accountability Act of 2015" builds on established principles of fair regulatory process and review. It would make the regulatory process more transparent, agencies more accountable, and regulations more carefully designed. The Chamber applauds your

introduction of the “Regulatory Accountability Act of 2015,” and looks forward to working with you on this bill.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bruce Josten". The signature is fluid and cursive, with the first name "R." being small and the last name "Josten" being larger and more prominent.

R. Bruce Josten

cc: The Honorable Ron Johnson
The Honorable John Cornyn
The Honorable Kelly Ayotte
The Honorable David Perdue