

**TESTIMONY BY COMMON CAUSE/PENNSYLVANIA
ON PROPOSED LOBBYING DISCLOSURE REGULATIONS**

Act 93 of 1998, Chapter 13

**House Judiciary Committee
Harrisburg, PA
February 25, 1999**

Chairman Gannon and members of the House Judiciary Committee, thank you for the privilege of presenting Common Cause/Pennsylvania's comments on the proposed regulations to Chapter 13, of Act 93, The Lobbying Disclosure Act. My name is Jean Becker. I chair the organization's Lobbying Reform Project Team.

Our comments are few. We believe that for the most part the regulations have been well designed, and will provide the lobbying community with proper direction for complying with its legal obligations under the Act. However, we would like to make the following recommendations.

Under Section 31.1 in the definition of "Anything of value", part (i)(C), after the word "conveyance", where it appears for the second time, add the words:

present or future;

and under part (i)(K) of the same definition add the words:

and Recreation .

The second modification is necessary to make it more consistent with the intent of the law as described under the definition of "Transportation and lodging or hospitality..."



In the definitions section, the term "de minimis" should be defined. In the alternative the term "de minimis" should be deleted in every place where it occurs and specific thresholds should be used to replace it. For example, under the definition of "Transportation and lodging..." a reasonable threshold would be ten dollars.

The content of section 35.1 (k)(2) should be deleted and replaced with the following:

The valuation of a complimentary ticket to any type of fund raising event shall be based upon the face value of the ticket.

full

The following suggestions, although not part of the regulations, are recommendations we believe are necessary to ensure proper compliance with the reporting requirements of the Act:

Before the regulations take effect, require the Ethics Commission to provide free training seminars for lobbyists on how to comply with the regulations, record-keeping, registration, reporting standards and restricted activities.

Prior to conducting the seminars all lobbying registration and disclosure forms and manuals should be made available to lobbyists.

In closing, I would like to congratulate you, and all members of the General Assembly, for rescuing Pennsylvania's reputation from the humiliation of being the worst in the nation for its oversight of lobbyists' activities. At the same time, I must point out that while we took a giant step forward in providing the public the kind of information they need to understand the pressures being exerted upon their institutions of government, Act 13 certainly is far from being the toughest lobbyist disclosure and regulation law in the country. Many states require significantly more disclosure of lobbyists activities and spending, and thus tougher bookkeeping requirements. Many other states have significantly stricter prohibitions on lobbyists' activities. As you proceed with your regulatory review duties, we ask that you be careful not to weaken, in any manner, the disclosure obligations now required under the regulations or the Act. Any weakening of the standards would be a terrible and unjustifiable disservice to the citizens of Pennsylvania.

Thank you, and I will try to respond to any questions you may have.