

November 30, 2011

TO THE MEMBERS OF THE U.S. HOUSE OF REPRESENTATIVES:

The undersigned groups strongly urge you to pass H.R. 3010, the “Regulatory Accountability Act of 2011,” which would modernize the 65-year old Administrative Procedure Act and improve how federal agencies write the regulations that most significantly affect the U.S. economy.

We strongly believe that regulations need to be narrowly tailored, be supported by strong and credible data and evidence, and impose the lowest possible burden while still implementing Congressional intent. When agencies produce regulations that do not reflect these ideals, better mechanisms are needed to hold them accountable.

The “Regulatory Accountability Act of 2011” would enhance the regulatory process by:

- Increasing public participation in shaping the most costly regulations before they are proposed;
- Requiring that agencies must choose the least costly option unless they can demonstrate a need to protect public health, safety, or welfare;
- Giving interested parties the opportunity to hold agencies accountable for their compliance with the Information Quality Act;
- Providing for on-the-record administrative hearings for the most costly regulations to insure that agency data is well tested and reviewed;
- 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 2011” would build on established principles of fair regulatory process and review embodied in executive orders since the Clinton administration. These principles make the regulatory process more transparent, agencies more accountable, and regulations more cost-effective. This legislation would not affect any regulations that are already in effect, nor would it impact enforcement under current regulations.

We strongly urge you to support this important legislation.

Sincerely,

Academy of General Dentistry  
Adhesive & Sealant Council  
Aeronautical Repair Station Association

American Apparel & Footwear Association  
American Architectural Manufacturers Association  
American Bakers Association  
American Chemistry Council  
American Coatings Association  
American Coke & Coal Chemicals Institute  
American Composites Manufacturers Association  
American Concrete Pressure Pipe Association  
American Financial Services Association  
American Forest & Paper Association  
American Foundry Society  
American Home Furnishings Alliance  
American Hotel & Lodging Association  
American Institute for International Steel  
American Machine Tool Distributors' Association  
American Petroleum Institute  
American Sportfishing Association  
American Trucking Associations  
American Wholesale Marketers Association  
Associated Builders & Contractors, Inc.  
Associated Builders & Contractors, Inc. – Illinois Chapter  
Associated Builders & Contractors, Inc. – Pelican Chapter (LA)  
Associated Builders & Contractors, Inc. – Rhode Island Chapter  
Associated Builders & Contractors, Inc. – Rocky Mountain Chapter (CO)  
Associated Equipment Distributors  
Associated General Contractors of America  
Associated General Contractors of California  
Associated Wire Rope Fabricators  
Association for Hose & Accessories Distribution  
Association of Marina Industries  
Automotive Aftermarket Industry Association  
Automotive Parts Remanufacturers Association  
Brick Industry Association  
Business Roundtable  
Can Manufacturers Institute  
Consumer Data Industry Association  
Consumer Specialty Products Association  
Council of Industrial Boiler Owners  
CTIA – The Wireless Association  
Edison Electric Institute  
Equipment Marketing & Distribution Association  
Fabricators & Manufacturers Association, International  
Fashion Accessories Shippers Association  
Financial Services Roundtable  
Food Marketing Institute  
Forging Industry Association

INDA – Association of the Nonwoven Fabrics Industry  
Industrial Energy Consumers of America  
Industrial Fasteners Institute  
Industrial Supply Association  
Institute of Makers of Explosives  
Interlocking Concrete Pavement Institute  
International Sign Association  
International Sleep Products Association  
International Warehouse Logistics Association  
Irrigation Association  
Marine Retailers Association of the Americas  
Metal Powder Industries Federation  
Metal Treating Institute  
Metals Service Center Institute  
Motor & Equipment Manufacturers Association  
National Association of Chemical Distributors  
National Association of Federal Credit Unions  
National Association of Home Builders  
National Association of Manufacturers  
National Association of REALTORS®  
National Association of the Remodeling Industry  
National Association of Wholesaler-Distributors  
National Black Chamber of Commerce  
National Club Association  
National Council of Chain Restaurants  
National Council of Textile Organizations  
National Electrical Contractors Association  
National Electrical Manufacturers Association  
National Federation of Independent Business  
National Funeral Directors Association  
National Grain & Feed Association  
National Lumber and Building Material Dealers Association  
National Marine Distributors Association  
National Marine Manufacturers Association  
National Mining Association  
National Oilseed Processors Association  
National Petrochemical & Refiners Association  
National Restaurant Association  
National Retail Federation  
National Roofing Contractors Association  
National Shooting Sports Foundation  
National Small Business Association  
National Stone, Sand & Gravel Association  
Non-Ferrous Founders' Society  
North American Die Casting Association  
North American Equipment Dealers Association

North American Millers' Association  
NPES – The Association for Suppliers of Printing, Publishing & Converting Technologies  
Nuclear Energy Institute  
Outdoor Power Equipment & Engine Service Association  
Plastic Pipe & Fittings Association  
Portland Cement Association  
Precision Machined Products Association  
Pressure Sensitive Tape Council  
Printing Industries of America  
Professional Landcare Network  
Property Casualty Insurers Association of America  
Retail Industry Leaders Association  
Salt Institute  
Shipbuilders Council of America  
Small Business & Entrepreneurship Council  
Society of Chemical Manufacturers & Affiliates  
SouthWestern Association  
Specialty Equipment Market Association  
SPI – The Plastics Industry Trade Association  
Steel Manufacturers Association  
Textile Rental Services Association  
The Remanufacturing Institute  
Tree Care Industry Association  
U.S. Chamber of Commerce  
Window & Door Manufacturers Association