

January 12, 2015

Dear Representative,

The U.S. Public Interest Research Group, on behalf of the non-partisan, non-profit state PIRGs and their members, strongly opposes the Regulatory Accountability Act of 2015 (HR 185) and urges you to oppose the bill.

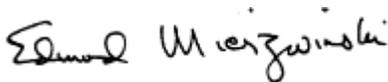
The Regulatory Accountability Act unnecessarily burdens our already-convoluted rule-making process. This bill would exacerbate the lengthy delays, undue influence by regulated industries and court challenges that already hamstring the way our regulatory agencies operate. If passed, the RAA would undermine our public protections and would threaten public health by jeopardizing safeguards designed to protect the financial marketplace and the workplace and ensure that consumers have untainted food and water and safe toys and other consumer goods.

This bill adds redundant and unneeded bureaucracy by adding 74 new analytical roadblocks under the Administrative Procedures Act. It would also require agencies to conduct senseless estimates of “indirect” costs and benefits of proposed rules and all potential alternatives without adequately defining said costs. Furthermore, the RAA would affect the ability for agencies to put forth “high impact” rules by allowing any interested person to petition an agency to hold a public hearing on a rule because of any “genuinely disputed” scientific or factual conclusions. These demands would do nothing to streamline the regulatory process and would only slow things down.

Finally, this bill would weaken statutes that prioritize public health, safety, and economic security by creating a presumption that agencies adopt the “least costly” alternative. This presumption would create a “super mandate” for all agency actions and would effectively override laws such as the Clean Air Act, the Clean Water Act, the Occupational Safety and Health Act, the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Consumer Product Safety Act.

The U.S. Public Interest Research Group and our members believe that our government needs more efficiency and streamlining and not more systems in place that would bog down the regulatory process. We therefore urge you to oppose the Regulatory Accountability Act of 2015. Please contact Mario Salazar, Legislative Director, with any questions ([mario@pirg.org](mailto:mario@pirg.org) or 202-546-9707, ext. 316).

Sincerely,



Edmund Mierzwinski  
Consumer Program Director



Mario Salazar  
Federal Legislative Director