

**HB**

**140**

<TARGET><BILL>HB 140</BILL><SUBJECT>HB  
140</SUBJECT><COMM>HFIN28</COMM></TARGET>



# FISCAL NOTE

**STATE OF ALASKA**  
**2014 LEGISLATIVE SESSION**

Bill Version CSHB 140  
 Fiscal Note Number \_\_\_\_\_  
 ( ) Publish Date \_\_\_\_\_

Identifier (file name) HB140CS-OOG-OMB-3-10-2014 Dept. Affected Various  
 Title Regulation Impact Transparency Act Appropriation Various  
 Allocation Various  
 Sponsor Representative Reinbold, P. Wilson, Hughes  
 Requester House Finance OMB Component Number \_\_\_\_\_

**Expenditures/Revenues** (Thousands of Dollars)

Note: Amounts do not include inflation unless otherwise noted below.

	FY15	Included in	Out-Year Cost Estimates				
	Appropriation Requested	Governor's FY15 Request	FY16	FY17	FY18	FY19	FY20
<b>OPERATING EXPENDITURES</b>	<b>FY15</b>	<b>FY15</b>	<b>FY16</b>	<b>FY17</b>	<b>FY18</b>	<b>FY19</b>	<b>FY20</b>
Personal Services	***		***	***	***	***	***
Travel							
Services							
Commodities							
Capital Outlay							
Grants, Benefits							
Miscellaneous							
<b>TOTAL OPERATING</b>	<b>***</b>	<b>0.0</b>	<b>***</b>	<b>***</b>	<b>***</b>	<b>***</b>	<b>***</b>

FUND SOURCE		(Thousands of Dollars)					
1002	Federal Receipts						
1003	GF Match						
1004	GF						
1005	GF/Prgm (DGF)						
1007	I/A Rcpts (Other)						
1156	Rcpt Svcs (DGF)						
		***	0.0	***	***	***	***

POSITIONS							
Full-time							
Part-time							
Temporary							

**CHANGE IN REVENUES**

Estimated SUPPLEMENTAL (FY14) operating costs 0.0 (separate supplemental appropriation required)  
 (discuss reasons and fund source(s) in analysis section)

Estimated CAPITAL (FY15) costs 0.0 (separate capital appropriation required)  
 (discuss reasons and fund source(s) in analysis section)

**ASSOCIATED REGULATIONS**

Does the bill direct, or will the bill result in, regulation changes adopted by your agency? Unknown  
 If yes, by what date are the regulations to be adopted, amended, or repealed? \_\_\_\_\_ Discuss details in analysis section.

**Why this fiscal note differs from previous version (if initial version, please note as such)**

Updated for 2014 Legislative Session. The CS allows state agencies to provide the annual estimated cost based on good faith effort and on information available to them at the time, and to provide the cost estimate in aggregate.

Prepared by Arnold Liebelt, Policy Analyst  
 Division Office of Management and Budget  
 Approved by Karen Rehfeld, Director  
 Division Office of Management and Budget

Phone (907) 465-4676  
 Date/Time 3/10/14 3:30 PM  
 Date 3/10/2014

## FISCAL NOTE ANALYSIS

STATE OF ALASKA  
2014 LEGISLATIVE SESSION

BILL NO. CSHB 140

### Analysis

CSHB 140 amends AS 44.62.190. Notice of Proposed Action.

The bill proposes changes to the statute that governs the requirements pertaining to the adoption, amendment, or repeal of a state regulation. As part of the information included with certain notices of proposed regulations, state agencies would need to include, if applicable, an identification of the law, order, decision, or other action of the federal government or a federal court that requires the proposed action. This language is not expected to cause a fiscal impact for state agencies.

The bill would further require that a state agency provide the estimated annual cost, based on a good faith effort to estimate the costs in the aggregate for each of the following categories using the information available to the state agency, to:

- a) private persons to comply with the proposed action;
- b) other state agencies to comply with the proposed action; and
- c) municipalities to comply with the proposed action.

This legislation will have varying impacts on state agencies. Agencies with a low volume of regulation work may have little cost impact. Agencies that regularly see a high volume of proposals (regulations) will be impacted to a greater degree by the legislation. For example, The Board of Fish and the Board of Game typically see more than 400 proposals annually that could result in new regulations, or a change to existing regulations, or the repeal of regulations. The Regulatory Commission of Alaska could also be significantly impacted by this legislation based on the amount of regulations that impact them annually.

Allowing the cost impact to be provided in the aggregate may lessen the burden on state agencies. However, for agencies to provide a good faith estimate, they would still need to consider the estimated annual impact to private persons, other state agencies, and municipalities. The cost estimate would be based on information available to the agency, but the bill does not indicate what state agency efforts would meet a standard of "good faith . . . using the information available to the state agency."

If CSHB 140(JUD) were enacted, fiscal notes prepared for any future legislation that directed agencies to adopt or change regulations would need to account for the cost of estimating the future regulations' cost impact to private persons, other state agencies, and municipalities. Depending on the legislation, this may require agencies to dedicate additional staff resources to ascertaining economic impacts or to contract for services that specialize in ascertaining economic impacts for these entities. The amount of those contracts might vary with the size and sophistication of the state agency involved, and also might vary according to what efforts would meet a standard of "good faith . . . using the information available to the state agency."

The cost for state agencies to implement the requirements in the legislation is indeterminate.

Adopted 3/21/14

AMENDMENT #2

OFFERED IN THE HOUSE  
TO: HB 140(FIN)

BY REPRESENTATIVE GARA

1 Page 2, line 28:

2 Insert "(6) An email subject line, and a title in a written publication, shall to the extent  
3 possible give a reader a fair idea of the substance of the regulation changed."

feasible

Adopted 3/21/14

28-LS0478\I.1  
3/21/14

Costello, Stoltze

AMENDMENT #1

OFFERED IN THE HOUSE  
TO: CSHB 140(FIN)

BY REPRESENTATIVE

Page 2, line 4:  
Following "section"  
Insert "**within 30 days**"

Language would read:

"The governor may return the regulations and orders of repeal to the adopting agency before they are submitted to the lieutenant governor for filing under (a) of this section **within 30 days** (1) if they are inconsistent with the faithful execution of the laws, or (2) to enable the adopting agency to respond to specific issues raised by the Administrative Regulation Review Committee."

Page 2, line 31:  
Following "inaccuracy"  
Insert "**or insufficiency**"

Following "of the"  
Insert "**good faith**"

Language would read:

"(f) Notwithstanding AS 44.62.300, a person may not bring action in court to challenge the adoption, repeal, or amendment of a regulation by a state agency for inaccuracy **or insufficiency** of the **good faith** cost estimates provided under (d)(3) of this section."

Page 4, line 30:  
Delete "seven"  
Insert "ten"

Language would read:

"(c) Within **ten** days after receiving a regulation, the chair of the Administrative Regulation Review Committee may submit to the lieutenant governor, by legislative memorandum or letter, comments regarding the regulations provided to the Administrative Regulation Review Committee under (b) of this section."

In addition to CS HB 140 (FIN) 28-LS0478\I the following changes are requested by the sponsor:

The first change is to ensure the governor reviews regulation expeditiously and does not inadvertently slow down the regulation process.

The second change is requested from the Department of Law to clarify that actions may not be brought to challenge the good faith estimates.

The last change is requested to give the Administrative Regulations Review Committee ten days for review instead of seven days to ensure a thorough review of the regulations.

Adopted 3/21/14

28-LS0478\I  
Bannister  
3/20/14

**CS FOR HOUSE BILL NO. 140(FIN)**

**IN THE LEGISLATURE OF THE STATE OF ALASKA**

**TWENTY-EIGHTH LEGISLATURE - SECOND SESSION**

**BY THE HOUSE FINANCE COMMITTEE**

**Offered:**

**Referred:**

**Sponsor(s): REPRESENTATIVES REINBOLD, Peggy Wilson, Hughes, Herron, LeDoux, Higgins, Thompson, Gara, Costello, Neuman, Tammie Wilson, Olson**

**A BILL**

**FOR AN ACT ENTITLED**

1 **"An Act relating to the proposed adoption, amendment, or repeal of a regulation; and**  
2 **relating to contact with agencies about regulations."**

3 **BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:**

4 **\* Section 1.** The uncodified law of the State of Alaska is amended by adding a new section  
5 to read:

6 **SHORT TITLE.** This Act may be known as the Regulation Impact Transparency Act.

7 **\* Sec. 2.** AS 44.62.040(c) is amended to read:

8 (c) Before submitting the regulations and orders of repeal to the lieutenant  
9 governor under (a) of this section, every state agency that by statute possesses  
10 regulation making authority, except [BOARDS AND COMMISSIONS,] the office of  
11 victims' rights [,] and the office of the ombudsman, **and except as otherwise**  
12 **provided by statute for the state agency,** shall submit to the governor for review a  
13 copy of every regulation or order of repeal adopted by the agency, except regulations  
14 and orders of repeal identified in **(a)(1) and (2)** [(a)(1) - (2)] of this section. The



1 governor may review the regulations and orders of repeal received under this  
2 subsection. The governor may return the regulations and orders of repeal to the  
3 adopting agency before they are submitted to the lieutenant governor for filing under  
4 (a) of this section (1) if they are inconsistent with the faithful execution of the laws, or  
5 (2) to enable the adopting agency to respond to specific issues raised by the  
6 Administrative Regulation Review Committee. The governor may not delegate the  
7 governor's review authority under this subsection to a person other than the lieutenant  
8 governor.

9 \* **Sec. 3.** AS 44.62.190(d) is amended to read:

10 (d) Along with a notice furnished under (a)(2), (4)(A), or (6) of this section,  
11 the state agency shall include

12 (1) the reason for the proposed action, including, if applicable, an  
13 identification of the law, order, decision, or other action of the federal  
14 government or a federal or state court that requires the proposed action, that is  
15 the basis for the proposed action, or to which the proposed action is responding;  
16 in this paragraph, "federal government" means a department, agency,  
17 corporation, or instrumentality of the United States government;

18 (2) the initial cost to the state agency of implementation;

19 (3) [,] the estimated annual costs, based on a good faith effort to  
20 estimate the costs in the aggregate for each of the following categories using the  
21 information available to the state agency, to

22 (A) private persons to comply with the proposed action;

23 (B) the state agency for [OF] implementation and to other  
24 state agencies to comply with the proposed action; and

25 (C) municipalities to comply with the proposed action;

26 (4) [,] the name of the contact person for the state agency; [,] and

27 (5) the origin of the proposed action.

28 \* **Sec. 4.** AS 44.62.190 is amended by adding a new subsection to read:

29 (f) Notwithstanding AS 44.62.300, a person may not bring an action in court  
30 to challenge the adoption, repeal, or amendment of a regulation by a state agency for  
31 inaccuracy of the cost estimates provided under (d)(3) of this section.

1 \* **Sec. 5.** AS 44.62.200(c) is amended to read:

2 (c) An agency that issues a notice under this section shall **ensure** [ASSURE]  
3 that the notice is prepared in a form adequate for posting on the Alaska Online Public  
4 Notice System. **A complete copy of each proposed adoption, amendment, or**  
5 **repeal of a regulation and, if feasible and not prohibited by copyright, any**  
6 **document or other material incorporated by reference, including any document**  
7 **or other material incorporated by reference under this section, in the proposed**  
8 **adoption or amendment shall be posted on the Alaska Online Public Notice**  
9 **System.**

10 \* **Sec. 6.** AS 44.62.200(d) is amended to read:

11 (d) When a state agency [, OTHER THAN THE REGULATORY  
12 COMMISSION OF ALASKA, THE BOARD OF FISHERIES, OR THE BOARD OF  
13 GAME,] posts, furnishes, or otherwise provides a notice of the proposed adoption,  
14 amendment, or repeal of a regulation under AS 44.62.190, a brief description of the  
15 changes made by the proposed adoption, amendment, or repeal must accompany the  
16 notice. However, if, under AS 44.62.190(a), the notice is published in a newspaper or  
17 trade or industry publication or is broadcast, this subsection does not require that the  
18 brief description otherwise required by this subsection accompany the publication or  
19 the broadcast. To the extent practicable, the brief description shall be written in clear,  
20 easily readable language that a person without a legal background is able to  
21 understand. Notwithstanding AS 44.62.300, an action may not be brought for failure  
22 of the brief description to comply with the requirements of this subsection relating to  
23 the description of the changes or its clarity and readability.

24 \* **Sec. 7.** AS 44.62 is amended by adding a new section to read:

25 **Sec. 44.62.213. Agency contact with the public.** (a) Notwithstanding any  
26 other provision of this chapter, while an agency is developing a regulatory action and  
27 before the agency provides a notice of proposed action under AS 44.62.190, the  
28 agency may contact a person about the development of the regulatory action and the  
29 agency may answer a question from a person that is relevant to the development of the  
30 regulatory action. In this subsection, "regulatory action" means the adoption,  
31 amendment, or repeal of a regulation.

1 (b) Notwithstanding any other provision of this chapter, after an agency  
2 provides a notice of proposed action under AS 44.62.190, the agency may contact a  
3 person about the proposed action and the agency shall answer a question from a  
4 person that is relevant to the proposed action.

5 \* **Sec. 8.** AS 44.62.215 is amended to read:

6 **Sec. 44.62.215. Record of public comment.** In the drafting, review, or other  
7 preparation of a proposed regulation, amendment, or order of repeal, an agency, other  
8 than [A BOARD OR COMMISSION,] the office of victims' rights [,] and the office of  
9 the ombudsman, shall keep a record of its use or rejection of factual or other  
10 substantive information that is received electronically, orally, or [SUBMITTED] in  
11 writing as public comment and that is relevant to the accuracy, coverage, or other  
12 aspect of the proposed regulatory action.

13 \* **Sec. 9.** AS 44.62.245(c) is amended to read:

14 (c) The state agency shall also send the notice described in (b)(2) of this  
15 section to

16 (1) a person who has placed the person's name on a distribution list  
17 kept by the agency that lists persons who want to receive the notice; the agency may  
18 allow a person to request that distribution of the notice be by electronic means and  
19 shall honor that request if appropriate means are available; [AND]

20 (2) the regulations attorney in the Department of Law; and

21 (3) the members of the Administrative Regulation Review  
22 Committee.

23 \* **Sec. 10.** AS 44.62.320(b) is amended to read:

24 (b) At the same time a regulation is submitted to [FILED BY] the lieutenant  
25 governor for filing under AS 44.62.040, the lieutenant governor shall submit the  
26 regulation to the chair [CHAIRMAN] and all members of the Administrative  
27 Regulation Review Committee for review under AS 24.20.400 - 24.20.460 together  
28 with the fiscal information required to be prepared under AS 44.62.195.

29 \* **Sec. 11.** AS 44.62.320 is amended by adding a new subsection to read:

30 (c) Within seven days after receiving a regulation, the chair of the  
31 Administrative Regulation Review Committee may submit to the lieutenant governor,

1 by legislative memorandum or letter, comments regarding the regulation provided to  
2 the Administrative Regulation Review Committee under (b) of this section.

3 \* **Sec. 12.** The uncodified law of the State of Alaska is amended by adding a new section to  
4 read:

5 APPLICABILITY. AS 44.62.040(c), as amended by sec. 2 of this Act,  
6 AS 44.62.190(d), as amended by sec. 3 of this Act, AS 44.62.190(f), added by sec. 4 of this  
7 Act, AS 44.62.200(c), as amended by sec. 5 of this Act, AS 44.62.200(d), as amended by sec.  
8 6 of this Act, AS 44.62.213(b), enacted by sec. 7 of this Act, AS 44.62.215, as amended by  
9 sec. 8 of this Act, AS 44.62.245(c), as amended by sec. 9 of this Act, AS 44.62.320(b), as  
10 amended by sec. 10 of this Act, and AS 44.62.320(c), added by sec. 11 of this Act, apply to  
11 proposed regulations first published under AS 44.62.190 on or after the effective date of this  
12 Act.



Sean Parnell  
GOVERNOR

STATE OF ALASKA  
OFFICE OF THE GOVERNOR  
JUNEAU

August 26, 2013

## ADMINISTRATIVE ORDER NO. 266

I, Sean Parnell, Governor of the State of Alaska, under the authority of Article III, Sections 1 and 24 of the Alaska Constitution, and to the maximum extent allowed by law, establish the following Regulatory Efficiency Guidelines (REGS) for State agencies in the executive branch to use in the review, oversight, adoption, amendment, and repeal of regulations and in the recommendation of improvements to the Alaska Statutes.

### OBJECTIVES

This Order is intended to accomplish the following objectives:

- Minimize the cost, time, and burden to the affected public of complying with State regulations and encouraging State agencies to work with all stakeholders, to meet the objectives of Alaska Statutes;
- Reduce administrative cost and burden;
- Ensure that State regulations are consistent with Alaska Statutes and limited to carrying out the statutory purpose;
- Further the State's interest in preserving our State's rights in adopting regulations to implement federal programs and to receive federal funds.

### BACKGROUND AND PURPOSE

For many years, State agencies responsible for implementing State statutes and federal mandates have not consistently

- Reviewed, overseen, amended, or repealed existing regulations to streamline program operations and create efficiencies;
- Considered and communicated with the affected public regarding the cost and impacts of proposed new regulations; nor
- Modified proposed regulations in response to concerns raised by the affected public.

The public is best served when State agencies operate under direction such as REGS to ensure that regulations are up-to-date, clearly and plainly written, carry out the statutory purpose, take into account the costs imposed on individual Alaskans and those doing business in the state, particularly small businesses, and allow State agencies to facilitate implementation of a law in the most reasonable and cost-effective manner possible.

## AGENCY DIRECTIVES

1. Existing Regulations - Not later than October 15, 2013, and by September 15 in every succeeding year, each commissioner or agency head shall
  - Review, in consultation with the Department of Law, all existing regulations to ensure consistency with Alaska Statutes and the objectives of this Order and that costs of compliance to the public are minimized;
  - Identify regulations that should be repealed or amended to decrease the burden of fiscal and nonfiscal impacts on the affected public;
  - Discuss with members of the affected public, regulations that create an unnecessary burden; and
  - Advise the Governor and the Office of Management and Budget of the results of the review and recommendations for regulatory actions; any necessary State or federal statutory changes to implement the recommendations; and estimated costs and potential savings if the recommendations are implemented.
  
2. Proposed Regulations - Before proposed regulations are publicly noticed after the effective date of this Order, a State agency proposing the regulations shall
  - Assess the need for the regulations to avoid the adoption of unnecessary regulations;
  - Verify legal authority for the proposed regulations with the Department of Law, and verify that the regulatory language proposed is narrowly tailored to accomplish the statutory purpose;
  - Suggest to the Office of the Governor for consideration any changes to federal and State statutes to simplify and reduce costs of the newly proposed regulations;
  - Share ideas with members of the affected public to develop the proposed regulations through publicly noticed workshops or hearings, calls for written suggestions to improve the process, meetings with advisory boards to the State agency, or other similar means consistent with legal requirements;
  - Consider the use of a negotiated regulation-making process under AS 44.62.710 - 44.62.800;
  - Verify costs of implementation to the State agency and the affected public to ensure that the least costly alternatives are considered or enabled consistent with legal requirements; and
  - Coordinate with other State agencies that have overlapping responsibilities to avoid duplication while facilitating compliance with law.

Each commissioner or agency head shall review the comments from the public on

publicly-noticed regulations and evaluate the fiscal and nonfiscal impacts on the affected public. If the commissioner or agency head has concerns regarding the economic impact on the affected public, the commissioner or agency head shall consider regulatory alternatives to achieve the agency's statutory purpose while minimizing the impact, costs, and burden on the affected public. Consistent with legal requirements, regulations must be amended if it is possible to achieve the statutory purpose while reducing the impact, costs, and burden on the affected public

### GENERAL PROVISIONS

Consistent with law and available appropriations, each affected State agency shall use existing personnel and monetary resources to comply with this Order.

### DEFINITION

In this Order, "affected public" includes

1. Small and other businesses subject to regulation or conducting regulated activity;
2. State government;
3. Local governments;
4. Nonprofit organizations; and
5. Individuals.

This Order takes effect immediately.

DATED at Juneau, Alaska, this 26th day of August, 2013.

/s/Sean Parnell  
Governor

**WWW.GOV.STATE.AK.US**

[Administrative Orders 201-present](#) | [Contact the Governor](#) | [Webmaster](#) | [State of Alaska](#)

# Alaska State Legislature



Representative Lora Reinbold

## Sponsor Statement House Bill 140

*"An Act relating to the information that must be included with certain notices provided for the proposed adoption, amendment, or repeal of a regulation."*

Under current law, state agencies that propose changes to the Alaska Administrative Code, our state regulations, are required to disclose certain information about the regulation, including the reason for the proposed action, costs of implementation of the regulation to the adopting agency and the origin of the proposed regulation.

To provide better information about regulations that may significantly affect private individuals and businesses, other state agencies and local governments, House Bill 140 requires that regulation notices include information about estimated costs beyond those to the agency.

In view of the increasing reach of the Washington D.C. into Alaska's affairs, the bill also requires that when the federal government is the reason for the regulation, the exact federal law, executive order or decision be identified in order for Alaskans to better understand government actions that affect their businesses and lives.

I respectfully request your support for this legislation.





## **Representative Lora Reinbold Alaska State Legislature**

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### Sectional Analysis: House Bill 140

Sec. 1 Short title: "Regulation Impact Transparency Act." House Bill 140 will require additional information in state agency notices of proposed regulations, specifically to increase transparency of the proposal's fiscal impacts, including to the private sector.

Sec. 2 Under current Alaska Statutes 44.62.190(d) the agency is required to provide a "reason for the proposed action." If the reason given is "federal," HB 140 will require identification of the federal action that is the reason for the proposed regulation. It also adds a requirement to estimate compliance costs to private persons (including private businesses), other state agencies and municipalities.

Sec. 3 Applicability: applies to regulations proposals noticed on or after the effective date of this act.

Dated: February 27, 2013

# Alaska State Legislature



Representative Lora Reinhold

## Explanation of Changes

Proposed CS for House Bill 140 (original version to version "C")

"An act relating to the information that must be included with certain notices provided for the proposed adoption, amendment, or repeal of a regulation."

- Section 2 AS 44.62.190 (d) (3). Language has been added to this section to clarify that the annual costs will be determined by a good faith effort to estimate the costs in the aggregate to private persons, other state agencies, and municipalities.
- Section 3 AS 44.62.190 (f). A new subsection has been added which makes clear that inaccuracy of the cost estimates established in this legislation is not grounds for litigation.
- Section 4 AS 44.62.190. This section clarifies that the notice requirements in the bill apply only to regulations promulgated after the effective date of the bill.

April 5, 2013

The Honorable Lora Reinbold  
Alaska House of Representatives  
Capitol Room 432  
Juneau, AK 99801

Re: House Bill 140

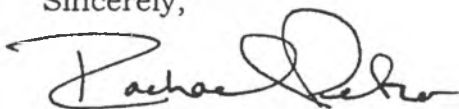
Dear Representative Reinbold,

The Alaska State Chamber of Commerce (Alaska Chamber) is an organization dedicated to improving the business climate in Alaska. The Alaska Chamber represents hundreds of statewide businesses from Ketchikan to Barrow that share a common goal: to make Alaska a viable and competitive place to do business. Today, I write in support of House Bill (HB) 140 – Notice for Regulation Adoption.

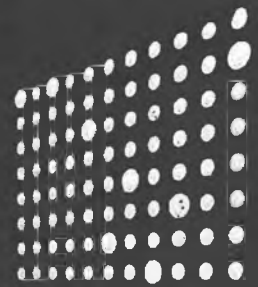
The Alaska Chamber supports legislation that updates and clarifies laws as they relate to doing business in Alaska and generally improves our business climate. HB 140 recognizes that administrative code and regulations often can add to the cost of doing business in Alaska. HB 140 requires costs to businesses and other governments be estimated during the adoption process.

Alaska has unique characteristics and challenges when it comes to being competitive in the marketplace – like our Arctic conditions, lack of economies of scale, etc. Promulgation of code and regulations by the State of Alaska should not add to our challenges with being competitive. By requiring cost estimates for businesses and government, HB 140 is an important first step to protect against the State of Alaska reducing Alaska's competitiveness for business investment.

Sincerely,



Rachael Petro  
President/CEO



ALASKA STATE  
CHAMBER  
OF COMMERCE

*The Voice of  
Alaska Business*

**Headquarters**

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# NFIB

The Voice of Small Business®

ALASKA

March 14, 2013

The Honorable Lora Reinbold  
State Capitol Building  
Juneau, Alaska 99801-1182

RE: House Bill 140

Dear Representative Reinbold:

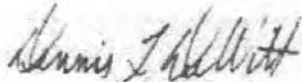
On behalf of the National Federation of Independent Business/Alaska, I wish to respectfully share our support for House Bill 140. The National Federation of Independent Business is the largest small-business advocacy group in Alaska.

Regulations promulgated by the administrative branch continue to add costs to the operation of small businesses in Alaska. All too often, those involved in writing regulations fail to realize the cost their actions have on private individuals and businesses that are not reimbursed by government. We are happy to see legislation recognizing this fact and requiring that it be recognized by administrative agencies as they consider new regulations.

The National Federation of Independent Businesses/Alaska polled its members asking if legislation or regulation that pertain to business require a cost-benefit analysis before implementation. Our members voted 71% in favor of such a requirement. While this is not specifically addressed in the legislation, HB 140 is a substantive step towards recognizing the cost of regulations to the private sector and municipalities.

If we want Alaska to be welcoming to small business, it is important the state begin to recognize the costs it mandates on those small businesses. Until we require those costs be officially recognized, it is difficult to reduce regulatory costs for small businesses.

Sincerely yours,



Dennis L. DeWitt  
Alaska State Director

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Cc: NFIB/AK Leadership Council  
House Judiciary Committee



WASILLA AREA SENIORS INC.

ROOTED IN DIGNITY | SERVING WITH RESPECT

March 20, 2013

The Honorable Representative Lora Reinbold  
House of Representatives  
Alaska State Capitol  
Juneau, AK 99801-1182

Dear Representative Reinbold,

On behalf of Wasilla Area Seniors, Inc., I would like to offer support for House Bill 140, the "Regulation Transparency Act." Regulations which are passed impact our daily lives in many ways and often have unintended consequences and huge costs to organizations and individuals. It is vital that the consequences and financial burden of these regulations be considered carefully prior to implementation.

House Bill 140 will work to ensure that agencies thoughtfully take into consideration the many outer costs that these regulations will initiate. As well as create an awareness of these potential costs that these regulations will pose, both to private individuals and to organizations such as ours.

We feel that this "Regulation Impact Transparency Act" is an important step in creating an open and thoughtful regulation process.

Sincerely,

Ingrid Ling  
Executive Director  
Wasilla Area Seniors, Inc.

PHONE 907.376.3104 | FAX 907.373.5170

1301 CENTURY CIRCLE | WASILLA, ALASKA 99654

WASILLASENIORS.COM



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March 25, 2013

Honorable Representative Lora Reinbold  
Alaska State Capitol  
Juneau, Alaska

RE: HB 140

Dear Representative Reinbold,

The Alaska Municipal League would like relay to you our support for HB 140.

While most regulations at the state level and more than a few at the federal level impact municipalities, it is always helpful to have some idea of how that impact will affect our bottom line; for planning and budgetary considerations.

I believe that having this information available to Legislators will also help to identify legislation that might be forthcoming in order to save individuals and/or municipalities money. While the cost of implementation to the agency may be minimal, the costs that will be required of individuals and municipalities may impose more damage than the regulation is worth.

We applaud your attempt to encourage all involved to look at broader impacts of regulation changes.

Sincerely,

A handwritten signature in cursive script that reads 'Kathie Wasserman'.

Kathie Wasserman  
Executive Director



Council of  
**Alaska Producers**

March 15, 2013

The Honorable Representative Lora Reinbold  
House of Representatives  
Alaska State Capitol  
Juneau, AK 99801-1182

Dear Representative Reinbold,

The Council of Alaska Producers (CAP) would like to thank you for introducing HB140, the Regulation Impact Transparency Act.

CAP is a non-profit trade association formed in 1992 and serves as a spokesperson for the large metal mines and major metal developmental projects in the state. The Council brings together mining companies with interest in Alaska to represent and inform members on legislative and regulatory issues, to support and advance the mining industry, to provide education to members, the media, and the general public on mining related issues, and to promote economic opportunity and environmentally sound mining practices.

CAP supports a regulatory framework that is rigorous, science based, transparent and predictable and we support HB140 as it provides transparency to proposed regulation changes in the State of Alaska.

It does this by ensuring that details of their provenance, including any federal action that may have resulted in their proposal, are available to the public. It also requires an accounting of the costs to private persons and municipalities that would be required to comply with any proposed regulation change.

By providing additional transparency to the process, this bill will allow all Alaskans to fully understand the impact of regulatory changes to their businesses and their daily lives.

We thank you for your support of the Alaska mining industry and we look forward to providing additional support to this bill as it moves through the legislative process.

Sincerely,

Michael Satre, Executive Director  
PO Box 33499  
Juneau, Alaska 99803  
907-957-2149

Comments on HB140: Notice for Regulation Adoption