

Aric Newhouse

Senior Vice President
Policy and Government Relations

November 30, 2011

U.S. House of Representatives
Washington, DC 20515

Dear Representative:

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, urges you to support H.R. 3010, the Regulatory Accountability Act.

While the benefits of appropriate regulations are clear, the challenge is creating an efficient regulatory system that does not unreasonably impede innovation and job creation. Regulations should be narrowly tailored and supported by strong and credible data, while imposing the least burden possible on our nation's job creators.

Unfortunately, little has been done to improve the law governing federal rulemaking – the Administrative Procedure Act (APA) – since its enactment in 1946. Executive orders from Presidents Reagan, Clinton and Obama have required agencies to engage in cost-benefit analysis and choose regulations that justify the costs. Nevertheless, agencies have increasingly found ways to circumvent the requirements of those orders.

Key provisions in H.R. 3010 would enhance the regulatory process by: increasing public participation in shaping rules before they are proposed; preventing agency abuses of interim final rules; requiring agencies to use the least costly option in most circumstances; and providing for appropriate review of the rationality of agency decisions.

We believe the principles set forth in H.R. 3010 would create a fairer and more transparent process, while holding agencies more accountable. We urge your support.

The NAM's Key Vote Advisory Committee has indicated that votes on H.R. 3010, including procedural votes, may be considered for designation as Key Manufacturing Votes in the 112th Congress. Thank you for your consideration.

Sincerely,



Aric Newhouse

Key Manufacturing Vote