



June 23, 2015

The Honorable Steve Daines  
United States Senate  
320 Hart Senate Office Building  
Washington, D.C. 20510

Dear Senator Daines:

On behalf of the National Federation of Independent Business (NFIB), the nation's leading small business advocacy organization, I am writing in support of S. 1487, *the Regulatory Predictability for Business Growth Act of 2015*. This legislation would ensure that all revised interpretative rules undergo the notice and comment process that is a mainstay of administrative procedure.

Excessive and complex regulatory burdens continue to be a hardship for many small-business owners across America. According to NFIB's most recent *Small Business Economic Trends* survey, "government requirements and red tape" was the number one answer when NFIB members were asked to identify the single biggest problem facing their business. The uncertainty caused by future regulation negatively affects a small business's ability to plan for future growth.

The notice and comment process allows the public to provide input to federal regulators before a rule is made final. This allows small business owners to inform agencies about the potential harm a proposed rule may have on their business. Unfortunately, under current law federal regulators may bypass this vital process by issuing an interpretative rule. While interpretative rules are meant to provide guidance as to how an agency intends to administer a given law, recent presidential administrations have utilized the process to implement substantial regulatory revisions. Small business owners and the public should be given the opportunity to weigh in on these important changes.

*The Regulatory Predictability for Business Growth Act* is an important piece of legislation that would close this loophole and ensure small business owners have the opportunity to comment on rules that significantly impact their small business. NFIB looks forward to working with you both on this and other issues important to small business in the 114<sup>th</sup> Congress.

Sincerely,

A handwritten signature in black ink that reads "Amanda Austin". The signature is written in a cursive, flowing style.

Amanda Austin  
Vice President, Public Policy

National Federation of Independent Business

1201 F Street NW \* Suite 200 \* Washington, DC 20004 \* 202-554-9000 \* Fax 202-554-0496 \* [www.NFIB.com](http://www.NFIB.com)