

July 30, 2002

The Honorable John F. Kerry
Chairman, Committee on Small Business
428 a Russell SOB
United States Senate
Washington, DC 20510-6136

Dear Mr. Chairman :

I am writing in response to your request for the Office of Advocacy's views on S. 2483, the National Small Business Regulatory Assistance Act and H.R. 2666, the Vocational and Technical Entrepreneurship Development Act.

It is my understanding that both these bills were discussed at a mark-up last week and will be the topic of a roundtable discussion this week. I appreciate your interest in our views and I apologize for not being able to present them in person because of a scheduling conflict.

First, let me start by explaining that as an office charged with independently representing the views of small business, these opinions do not necessarily reflect the positions of SBA Administrator Hector Barreto, or the Administration.

The Office of Advocacy promotes a small business agenda by publishing research on the economic benefits of small business and by ensuring agency compliance with the Regulatory Flexibility Act, as amended in 1996 by the Small Business Regulatory Enforcement Fairness Act. Additionally, my office is required by law to help small business understand rules and regulations mandated by federal agencies. It is that obligation, codified in 15 U.S.C. § 634(b), which prompted me to respond to your request for comment on the legislation before the Committee on Small Business and Entrepreneurship.

H.R. 2666, the Vocational and Technical Entrepreneurship Development Act

The Office of Advocacy does not believe that H.R. 2666 would affect our programs and ability to advocate effectively on behalf of small business. Nor do we believe that H.R. 2666 in any way affects the statutory obligations of the Office of Advocacy. We therefore respectfully decline to comment on the legislation.

S. 2483, the National Small Business Regulatory Assistance Act

The Office of Advocacy strongly endorses any cost-effective method of providing small-business owners with federal regulatory compliance information. We are supportive of S. 2483 to the extent that it encourages the sharing of information between compliance assistance providers and we are pleased to understand that this legislation does not favor one avenue of information dissemination over another. The Committee deserves credit for ensuring that the practical effect of S. 2483 will be to prevent Small Business Development Centers (SBDCs) from acting as the only state-level source for compliance information.

It is an honor for me to serve the President and I am grateful that you regularly solicit my office's views while considering legislation that will benefit small business. Most importantly, I am pleased that you thoroughly consider my views as an independent advocate for small business when balancing the various interests that affect the outcome of legislation. Please do not hesitate to call if I may clarify any of the statements or positions outlined in this correspondence.

Sincerely,

Thomas M. Sullivan
Chief Counsel for Advocacy

Cc: The Honorable Kit Bond