



**SMALL BUSINESS  
LEGISLATIVE  
COUNCIL**

June 20, 2000

The Honorable Jim Talent  
Chairman, House Committee on Small Business  
2361 Rayburn House Office Building  
United States House of Representatives  
Washington, D.C. 20515

Dear Chairman Talent:

On behalf of the member associations of the Small Business Legislative Council (SBLC), I want to express our unwavering support for the SBA Office of Advocacy and the important role it has played in defending and helping small businesses. For nearly two decades the Office of Advocacy has been at the forefront of the important policy debates involving small business interests. In those debates the Office of Advocacy has served as an independent voice of reason in an otherwise hostile environment for small business. As a result, SBLC would not support legislative efforts to strip or alter the Office of Advocacy's current authority to be a strong advocate for small businesses.

The enactment of the Small Business Regulatory Enforcement Fairness Act (SBREFA) of 1996 expanded the responsibilities of the Office of Advocacy under the Regulatory Flexibility Act. Specifically, SBREFA requires the Office of Advocacy to participate in a panel review of new regulations under consideration by either the Occupational Safety and Health Administration (OSHA) or the Environmental Protection Agency (EPA). While in the past, regulatory agencies such as OSHA and EPA routinely dismissed their small business obligations under the RFA, the SBREFA panel process, through the Office of Advocacy, now provides small business with a voice early on in the rulemaking process.

Consider the effect SBREFA and the Office of Advocacy have had on OSHA's proposed ergonomics standard. As a result of the Office of Advocacy's economic research, OSHA was required to adjust the cost impact of the proposed ergonomics rule as well as concede other significant changes. While the proposed ergonomics regulation remains far from perfect, without the Office of Advocacy's participation in the debate, the small business community would be staring at an even more onerous proposal.

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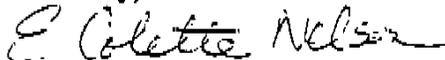
The Office of Advocacy has also been in the trenches fighting for the interest of small business when it comes to procurement reform. On issues such as contract bundling, unfair government competition, contractor blacklisting, Federal Prison Industries and electronic commerce, the Office of Advocacy has been there to make sure the concerns of small business are heard.

Moreover, the Office of Advocacy has been at the vanguard of small business tax issues. In the current Congress alone, the Office of Advocacy has played a role in shaping the debates over the estate tax, retirement savings plan reform, cash vs. accrual accounting, installment sales, and independent contractor legislation.

So whether it is OSHA's current attempts to regulate repetitive stress injuries, regressive government procurement practices, or ensuring tax fairness, the Office of Advocacy has been there for small business. Maintaining a strong, independent Office of Advocacy will continue to be a priority for SBLC.

The SBLC is a permanent, independent coalition of nearly 80 trade and professional associations that share a common commitment to the future of small business. Our members represent the interests of small businesses in such diverse economic sectors as manufacturing, retailing, distribution, professional and technical services, construction, transportation, and agriculture. Our policies are developed through a consensus among our membership. Individual associations may express their own views. For your review, a list of our members is enclosed.

Sincerely,



E. Colette Nelson  
Chairwoman

Enclosure

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## **Members of the Small Business Legislative Council**

**SIL**

**Air Conditioning Contractors of America**  
**Alliance of Independent Store Owners and Professionals**  
**American Association of Equine Practitioners**  
**American Bus Association**  
**American Consulting Engineers Council**  
**American Machine Tool Distributors Association**  
**American Moving and Storage Association**  
**American Nursery and Landscape Association**  
**American Road & Transportation Builders Association**  
**American Society of Interior Designers**  
**American Society of Travel Agents, Inc.**  
**American Subcontractors Association**  
**Associated Landscape Contractors of America**  
**Association of Small Business Development Centers**  
**Association of Sales and Marketing Companies**  
**Automotive Recyclers Association**  
**Bowling Proprietors Association of America**  
**Building Service Contractors Association International**  
**Business Advertising Council**  
**CSA**  
**Council of Fleet Specialists**  
**Council of Growing Companies**  
**Demotion Association of North America**  
**Direct Selling Association**  
**Electronics Representatives Association**  
**Expressors' Transworld Delivery Association**  
**Health Industry Representatives Association**  
**Helicopter Association International**  
**Independent Bankers Association of America**  
**Independent Medical Distributors Association**  
**International Association of Refrigerated Warehouses**  
**International Franchise Association**  
**Machinery Dealers National Association**  
**Mail Advertising Service Association**  
**Manufacturers Agents for the Food Service Industry**  
**Manufacturers Agents National Association**

**Manufacturers Representatives of America, Inc.**  
**National Association for the Self-Employed**  
**National Association of Plumbing-Heating-Cooling Contractors**  
**National Association of Realtors**  
**National Association of RV Parks and Campgrounds**  
**National Association of Small Business Investment Companies**  
**National Association of the Remodeling Industry**  
**National Community Pharmacists Association**  
**National Electrical Contractors Association**  
**National Electrical Manufacturers Representatives Association**  
**National Lumber & Building Material Dealers Association**  
**National Ornamental & Miscellaneous Metals Association**  
**National Paperbox Association**  
**National Retail Hardware Association**  
**National Society of Accountants**  
**National Tooling and Machining Association**  
**National Wood Flooring Association**  
**Organization for the Promotion and Advancement of Small Telephone Companies**  
**Painting and Decorating Contractors of America**  
**Petroleum Marketers Association of America**  
**Printing Industries of America, Inc.**  
**Professional Lawn Care Association of America**  
**Promotional Products Association International**  
**The Retailer's Bakery Association**  
**Saturation Mailers Coalition**  
**Small Business Council of America, Inc.**  
**Small Business Exporters Association**  
**SMC Business Councils**  
**Society of American Florists**  
**Tire Association of North America**  
**Turfgrass Producers International**  
**United Motorcoach Association**  
**Washington Area New Automobile Dealers Association**

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