



Consumers for Auto Reliability and Safety

November 28, 2011

Honorable Members
United States House of Representatives
Washington, DC 20515

Re: OPPOSITION:
H.R. 10, Regulations from the Executive in Need of Scrutiny (REINS) Act
H.R. 3010, Regulatory Accountability Act
H.R. 527, Regulatory Flexibility Improvements Act

Dear Representative:

Consumers for Auto Reliability and Safety (CARS) is a national, award-winning non-profit auto safety and consumer advocacy organization dedicated to preventing motor vehicle-related fatalities, injuries and economic losses. Over the years, CARS has spearheaded and actively supported promulgation of numerous laws and regulations that have saved tens of thousands of lives, prevented hundreds of thousands of serious and debilitating injuries, and saved the American public many billions of dollars. For many years, landmark legislation proposed by CARS has been successfully enacted and signed by Governors of California from both major political parties, establishing precedents adopted by other states.

H.R. 10, the Regulations from the Executive in Need of Scrutiny (the REINS Act), H.R. 3010, the Regulatory Accountability Act, and H.R. 527, the Regulatory Flexibility Improvements Act, would lead to lengthy and unnecessary delays in rules that will move the nation forward in improving protections against unsafe products, pollution, and predatory financial scams. At the same time, they would delay or eliminate the creation of new skilled manufacturing jobs, for example in producing improved vehicle safety systems and components that reduce greenhouse gas emissions.

They threaten to tip the balance of power even further in favor of high-paid lobbyists for moneyed interests that make products that maim, kill, pollute, and sap our economy, at the expense of the American public. They also would hamstring the ability of the Executive branch to move the nation forward, subjecting the executive branch to the same gridlock that the vast majority of Americans finds abhorrent in the current Congress.

H.R.10 (REINS) would require any rule with a potential economic impact of \$100 million or more to be approved by both the House and Senate before it could take effect. Since the Senate rules

allow a single senator to put a secret hold on a bill, that means that a single senator, from a state where a corporate interest has undue political influence, could hold the rest of the nation hostage, and deny the rest of the nation the benefits of the new rule -- no matter how urgently it is needed, how many lives it would save, how many injuries it would prevent, how many jobs it would create, or how widespread the public support is for moving forward.

H.R. 527 would create a new bureaucratic small business "czar" who would be empowered to review nearly all proposed regulations and tie up the regulatory process indefinitely. This would cynically exploit the desire to address legitimate needs of small businesses in order to subvert the entire regulatory process.

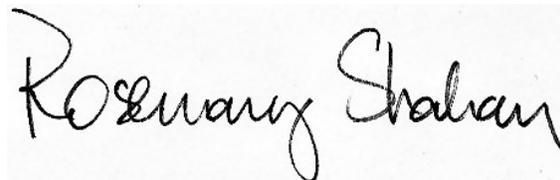
H.R. 3010 would greatly increase the costs of moving forward with new regulations by allowing multi-national corporate interests, no matter how corrupt they may be, to tie the regulatory process in knots, by mounting expensive legal challenges. It would impose unprecedented new burdens on public agencies and the courts, and cause unlimited delays, regardless how urgently action is needed in order to prevent further harm to public health, the environment, or the economy.

H.R. 10, H.R. 3010 and H.R. 527 are dangerous proposals that threaten to further weaken our economy, harm the environment, and increase the human and economic toll of unsafe products. They would waste federal resources and increase the power of corporate scofflaws over American families. They would also delay the day when our economy moves forward to create new jobs in sectors of the economy where we desperately need to be more competitive with other nations.

In the strongest possible terms, we urge you to actively oppose each of these bills, and to do all in your power as elected representatives of the American people to defeat them.

Thank you for your consideration of our views. Should you or your staff have any questions regarding our position, please do not hesitate to contact me directly.

Sincerely,

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

Rosemary Shahan
President