



**OFFICE OF ADVOCACY
U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416**

June 4, 2003

BY FACSIMILE

Mr. Stanton D. Anderson
Office of Information Technology and E-Government
Office of Management and Budget
Washington, DC 20503

RE: Draft Small Business Paperwork Relief Task Force Report

Dear Mr. Anderson:

This letter provides comments from the Office of Advocacy regarding the “Draft Report of the Small Business Paperwork Relief Task Force,” (Draft Report), which the Office of Management and Budget (OMB) published on May 9, 2003. The Small Business Paperwork Relief Act of 2002 (Pub. L. 107-198) created the Task Force, which is composed of federal agencies, including the Office of Advocacy. The law requires the Task Force to submit a report to Congress on paperwork burden relief by June 28, 2003.

Congress established the Office of Advocacy under Pub. L. No. 94-305 to advocate the views of small business before Federal agencies and Congress. Because Advocacy is an independent entity within the U.S. Small Business Administration (SBA), the views expressed by Advocacy do not necessarily reflect the position of the Administration or the SBA. Our comments on the Draft Report are made in light of our role as small business advocate.

Advocacy commends OMB for managing the completion of the Draft Report within the very short timeframe required by the Act. OMB’s leadership enabled several

diverse Federal agencies to work together expeditiously to research current paperwork burdens and to evaluate paperwork relief strategies.

Advocacy believes that OMB's efforts would be improved if the Draft Report would more fully address the pressing paperwork concerns of small business. Small business representatives have told Advocacy that the Draft Report does not place sufficient emphasis on: (1) ensuring that a single point of contact is established within each agency, (2) developing a usable catalogue of government-wide paperwork requirements, (3) finding ways to eliminate unneeded or duplicative paperwork requirements, and (4) encouraging agencies to waive penalties for first-time paperwork violators.

Advocacy hopes that the final draft of the Task Force report will fully address these four critical issues, which have been repeatedly communicated to Advocacy by small business representatives. We believe that agencies, with assistance from Advocacy and OMB, can and should take reasonable, positive steps to alleviate the paperwork burden on small business. The Office of Advocacy applauds this step forward and stands ready to assist OMB and the Task Force in preparing a report to Congress that will go even further to address the issues of concern to small business. If you have any questions regarding these comments, please feel free to contact Keith Holman at (202) 205-6936 or keith.holman@sba.gov.

Sincerely,

/s/ _____

Thomas M. Sullivan
Chief Counsel for Advocacy

/s/ _____

Keith W. Holman
Assistant Chief Counsel