



November 25, 2020

Mr. Curtis Rich  
Agency Clearance Officer  
U.S. Small Business Administration  
409 Third Street SW, 5<sup>th</sup> Floor  
Washington, DC 20416

SBA Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
Washington, DC 20503

Re: 30-Day Notice – Reporting and Recordkeeping Requirements Under OMB Review  
85 FR 67809 / Document Number 2020-23554

Dear Sirs or Sir and Madam:

The National Association of Government Guaranteed Lenders (NAGGL) appreciates the opportunity to provide comments on the information collection relating to the *Paycheck Protection Program (PPP)*, OMB Control Number 3245-0407, including:

1. SBA Form 2483, *Paycheck Protection Program Borrower Application Form*
2. SBA Form 2484, *Paycheck Protection Program Lender's Application for 7(a) Guaranty*
3. SBA Form 3506, *CARES Act Section 1102 Lender Agreement*
4. SBA Form 3507, *CARES Act Section 1102 Lender Agreement—Non-Bank and Non-Insured Depository Institution Lender*
5. SBA Form 3508, *Paycheck Protection Program—Loan Forgiveness Application*
6. SBA Form 3508S, *Paycheck Protection Program—PPP Loan Forgiveness Application Form 3508S*
7. SBA Form 3508EZ, *Paycheck Protection Program—PPP Loan Forgiveness Application Form 3508EZ*
8. (Form Number N/A), *Lender Reporting Requirements Concerning Requests for Loan Forgiveness*
9. (Form Number N/A), *Lender Reporting Requirements for SBA Loan Reviews*
10. SBA Form 3509, *Loan Necessity Questionnaire (For-Profit Borrowers)*

### *11. SBA Form 3510, Loan Necessity Questionnaire (Non-Profit Borrowers)*

First, we must note that while the Federal Register states that the notice is being published to allow comments on the “proposed” information collection, that characterization is inaccurate in that all of the forms listed above intended to collect PPP loan information have been in use for some time.

In fact, as it relates to items 1 and 2, the PPP Borrower and Lender Loan Application forms, comments related to those forms are now moot because the deadline for submission of loan applications has passed and the forms are no longer in active use. [We assume that any new PPP-like legislation would require new forms and we would welcome the opportunity to comment on such forms at the appropriate time, and in the appropriate manner.]

In this regard, NAGGL fully understands that the urgent need to get immediate assistance to the small businesses that were suffering because of the COVID-19 emergency necessitated emergency procedures that did not allow for the usual vetting afforded to government information collections. However, now that we are nearly eight months beyond the date of CARES enactment, we believe that the more recently issued forms, including the forgiveness applications and, especially the Loan Necessity Questionnaires, could have allowed for non-emergency handling.

Specifically, as it relates to items 10 and 11, the Loan Necessity Questionnaires, we are attaching letters sent on November 17, 2020 to the Congress and the Secretary of Treasury and Administrator of the U.S. Small Business Administration (SBA). NAGGL was among the more than 80 signatories on those letters and asks you to consider them as part of our comments.

As noted in detail in the letter to the Congress, NAGGL strongly believes that the questionnaires, SBA Forms 3509 and 3510, are inappropriate for a number of reasons, including the fact that they represent an after-the-fact attempt to collect information not originally envisioned in the CARES Act, as amended. As stated in that letter, the statutory intent of the necessity certification was to “permit a borrower to self-assess its need for a PPP loan based on the economic uncertainty it was aware of *at the time of its loan application*”. The Necessity Questionnaires, issued many months after the enactment of the CARES Act, requires data based on the PPP borrower’s situation as it is today, as opposed to its assessment of the situation that it found itself in when it was applying for a PPP loan.

Therefore, as also noted in a different context in the letter to Congress, we do not believe this collection of information, as currently constituted, is necessary or appropriate in order for SBA to properly perform its function. Instead, consistent with our previous letter to the Congress, NAGGL recommends that a more appropriate approach would be to “ask the [PPP] borrower to provide a narrative statement with any documentation the borrower believes appropriate to support the basis for its good faith certification that the uncertainty in economic conditions made the PPP loan necessary to support the ongoing operations of the business”. As also noted in the attached letter, “this approach would be consistent with the commitment made by the agencies to review certain loans beyond the Forgiveness Application, but would not impose major changes to PPP criteria in an after the fact manner that could penalize small businesses that played by the rules”.

In the attached letter to the Congress, we also point out that the estimate of 90 minutes to complete either of the forms is not an accurate depiction of the time that it will take PPP borrowers borrower to assemble the information required to fully complete one of two versions of the form.

Finally, as it relates to the issue of whether there are ways to minimize the burden imposed by the questionnaires, we would note that both forms specifically require lenders to “upload the form and documents to the SBA PPP Forgiveness Platform ([forgiveness.sba.gov](https://forgiveness.sba.gov)) and separately input [the borrowers’] responses to each question into the web form available in the platform”. NAGGL has expressed concerns to SBA regarding this administrative burden, and strongly believes that the Agency should find an automated solution to replace this manual data entry. We also believe, that to the extent that these questionnaires will continue to be used, they should be made publicly available on the SBA and Department of the Treasury (Treasury) websites consistent with the way that all other PPP forms have been made available.

As to the questionnaires, we also would note that in both of the referenced letters, the signatories, including NAGGL, requested that use of SBA Forms 3509 and 3510 be suspended until all of the issues referenced in the letters can be resolved. We are reiterating that request as part of these comments.

As to the remaining data collection items, based on feedback received from lenders participating in the PPP Program and the feedback that they received from applicants for, and recipients of, PPP loans, NAGGL also believes that the estimated annual hour burden for all the data collection items is grossly understated. Much of the information requested in the enumerated forms requires borrowers to provide data that would not be assembled in the



normal course of their business operations, including requiring off-cycle financial information, i.e., data based on a specific period of time as opposed to the business' normal financial reporting cycle.

Finally, as it relates to items 8 and 9, the Lender Reporting Requirements relating to Loan Forgiveness and Loan Reviews, please refer again to the attached letter to the Congress which discusses the concerns of all of the signatories, including NAGGL, regarding the burden being imposed on lenders to essentially act as an agent of the government in the loan forgiveness and loan review processes. Here we note that, based on the plain language in the CARES Act, lenders originally saw their role as conduits to get desperately needed assistance to small businesses with the understanding that the intention was for the lenders to provide loans that, in essence, would convert to government grants, i.e., be "forgiven", if all required conditions were met.

So, recognizing the urgency of the situation, lenders immediately began making PPP loans when only minimal guidance had been provided, taking it on faith that the necessary details would follow. But, virtually each time new guidance and program requirements have been issued, they have imposed a greater burden on lenders to perform as gatekeepers for the government and to fulfill many largely administrative functions.

On behalf of its members and the millions of borrowers that they have assisted with PPP loans, NAGGL respectfully requests that OMB withhold its approval of the extension of the information collection beyond its emergency expiration date (October 31, 2020) in order to allow the Treasury and SBA to consider the comments that have been received and to take appropriate steps to resolve all of the issues noted both in the referenced November 17 letters and in the comments being submitted in response to this request for comments.

Again, thank you for providing this opportunity for us to provide comments on the government's PPP data collection.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony R. Wilkinson'. The signature is fluid and cursive, with a large initial 'A'.

Tony Wilkinson  
President & Chief Executive Officer

cc: William Manger, Chief of Staff and Associate Administrator, Office of Capital Access

November 17, 2020

The Honorable Steven Mnuchin  
Secretary  
U.S. Department of Treasury  
1500 Pennsylvania Avenue NW  
Washington, D.C. 20220

The Honorable Jovita Carranza  
Administrator  
U.S. Small Business Administration  
409 3<sup>rd</sup> Street SW  
Washington, D.C. 20416

Dear Secretary Mnuchin and Administrator Carranza:

As the leading 80 national organizations representing the vast majority of the millions of small business borrowers and thousands of lenders participating in the Paycheck Protection Program (PPP), we write to make you aware of concerns that we are concurrently raising with Congress regarding the new review process, which includes the “Loan Necessity Questionnaires,” established by your agencies. Specifically, we are concerned that the questionnaires introduce a confusing and burdensome process for both borrowers and lenders, and we fear that it could lead the agencies to inappropriately question thousands of qualified PPP loans made to struggling small businesses.

On behalf of the millions of American workers supported by PPP loans, we would like to work with you directly to avoid this unintended consequence. While several of our organizations have had the opportunity to discuss some of these issues with key agency staff one-on-one, it is important that we communicate the full extent of our concerns on behalf of all the many organizations that have jointly come together as one voice on this critical issue. We appreciate the monumental role that your agencies play in implementing and overseeing PPP lending, and our organizations and the members that we represent look forward to working with you and the agencies to address these issues.

Attached is the letter we are simultaneously transmitting to Congress in which our organizations detail the most critical components of the issues the Loan Necessity Questionnaires and process present.

Of particular importance to flag, we would request that you consider temporarily suspending use of these questionnaires while we collectively address these issues and work together toward a better solution. This seems especially helpful considering that SBA is currently soliciting public comment through November 25 to determine “whether the collection of information is necessary,”<sup>1</sup> and the best approach to do so if deemed necessary. A temporary suspension could help avoid increasing borrower and lender confusion and concern as they attempt to comply with the process while simultaneously providing feedback on it. This action should fit well within your existing plans to be responsive to stakeholder feedback collected during the comment period.

We look forward continuing our dialogue with you.

---

<sup>1</sup> <https://www.federalregister.gov/documents/2020/10/26/2020-23594/reporting-and-recordkeeping-requirements-under-omb-review#h-8>

Sincerely,

American Bakers Association  
American Bankers Association  
American Council of Engineering Companies  
American Financial Services Association  
American Frozen Food Institute  
American Hotel & Lodging Association  
American International Automobile Dealers Association  
American Lighting Association  
American Mold Builders Association  
American Road & Transportation Builders Association  
American Society of Association Executives  
American Staffing Association  
America's SBDC  
Asian American Hotel Owners Association  
Associated Builders and Contractors  
Associated Equipment Distributors  
Associated General Contractors of America  
Association of International Certified Professional Accountants  
Bank Policy Institute  
Community Development Bankers Association  
Construction Industry Round Table  
Consumer Bankers Association  
Convenience Distribution Association  
Credit Union National Association  
Farm Credit Council  
Financial Executives International  
Foodservice Equipment Distributors Association  
Gases and Welding Distributors Association  
Glass Packaging Institute  
Global Business Travel Association  
Heating, Air-conditioning & Refrigeration Distributors International  
Independent Community Bankers of America  
Independent Electrical Contractors  
Independent Insurance Agents & Brokers of America  
Industrial Fasteners Institute  
Institute of Scrap Recycling Industries, Inc.  
International Association of Movers  
International Council of Shopping Centers  
International Dairy Foods Association  
International Foodservice Distributors Association  
International Franchise Association  
National Association of Federally-Insured Credit Unions  
National Association of Government Guaranteed Lenders  
National Association of Home Builders  
National Association of Manufacturers  
National Association of Wholesaler-Distributors

National Bankers Association  
National Community Pharmacists Association  
National Cooperative Business Association CLUSA  
National Council of Farmer Cooperatives  
National Electrical Contractors Association  
National Fastener Distributors Association  
National Funeral Directors Association  
National Marine Distributors Association, Inc.  
National Marine Manufacturers Association  
National Mining Association  
National Ready Mixed Concrete Association  
National Restaurant Association  
National Roofing Contractors Association  
National Small Business Association  
National Tooling and Machining Association  
National Wild Turkey Federation  
NFIB  
North American Association of Food Equipment Manufacturers  
North American Die Casting Association  
Outdoor Power Equipment and Engine Service Association, Inc.  
Precision Machined Products Association  
Precision Metalforming Association  
Professional Beauty Association  
Project Management Institute  
S Corporation Association  
Small Business & Entrepreneurship Council  
Small Business Investor Alliance  
Society of Collision Repair Specialists  
Southeastern Lumber Manufacturers Association  
Specialty Equipment Market Association  
The Metals Service Center Institute  
Tile Roofing Industry Alliance  
Tire Industry Association  
U.S. Chamber of Commerce

Attachment

November 17, 2020

The Honorable Nancy Pelosi, Speaker  
U.S. House of Representatives  
1236 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Mitch McConnell, Leader  
U.S. Senate  
317 Russell Senate Office Building  
Washington, D.C. 20510

The Honorable Kevin McCarthy, Leader  
U.S. House of Representatives  
2468 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Charles Schumer, Leader  
U.S. Senate  
322 Hart Senate Office Building  
Washington, D.C. 20510

Dear Speaker Pelosi, Majority Leader McConnell, Democratic Leader Schumer, and Republican Leader McCarthy:

As the leading 80 national organizations representing the vast majority of the millions of small business borrowers and thousands of lenders participating in the Paycheck Protection Program (PPP) in order to preserve millions of jobs for America's workforce, we write to express concern about a new review process, which includes the "Loan Necessity Questionnaires," established by the Small Business Administration (SBA) and the Department of Treasury (Treasury). The members of our organizations have been on the frontlines both delivering and receiving aid from PPP loans which have been critical to the small business economy over the last eight months. Unfortunately, the questionnaires introduce a confusing and burdensome process for both borrowers and lenders, and we fear that it could lead the agencies to inappropriately question thousands of qualified PPP loans made to struggling small businesses. On behalf of the millions of American workers supported by PPP loans, we urge you to act quickly to work directly with SBA and Treasury to avoid this unintended consequence.

Under the new requirements, PPP borrowers with loans of \$2 million or greater must complete one of two versions of the new Loan Necessity Questionnaire—SBA Forms 3509 (for-profit entities) or 3510 (non-profit entities)—and provide extensive documentation supporting their responses. Currently, the questionnaires only apply to loans of \$2 million and greater that have been submitted to SBA for forgiveness; however, without clear guidance in an Interim Final Rule, we are concerned about what types of review processes could be imposed on other borrowers. To date, the new process has not been described in any official regulations or SBA procedural notices, and the questionnaires have not been posted on either the Treasury or SBA websites.

Our organizations are fully supportive of appropriate review and oversight of PPP loans. The existing PPP Forgiveness Applications (SBA Forms 3508, 3508EZ and 3508S) require extensive documentation that speaks directly to how PPP borrowers retained or re-hired employees in the weeks after receiving PPP funds and throughout the covered period. This information allows the agencies to examine, in great detail and prior to the approval of loan forgiveness, relevant facts to ensure that PPP loan funds were used in the way Congress intended.



We also understand the agencies would like to conduct further review into certain loans. We strongly encourage you to ensure that all agency review processes are necessary and appropriate to avoid undue burden on borrowers and lenders, possible bias and subjectivity, or concerning departures from requirements borrowers and lenders understood from the statute and original implementing guidance. We do not believe that the information collection sought by the new Loan Necessity Questionnaires achieves this appropriate balance.

### *The CARES Act Requirements Related to Borrower Good Faith Certifications*

When Congress created PPP loans, borrowers and lenders understood that a small business that met various eligibility criteria would also be required to make a “good faith certification” of need for the loan at the time of the loan application. Specifically, the CARES Act calls for an eligible recipient to certify that the “uncertainty of current economic conditions makes necessary the loan request to support the ongoing operations of the eligible recipient.” The statute did not define the words “uncertainty” or “necessary” and did not provide standards by which to measure compliance, nor have those terms ever been defined in subsequent implementing guidance by the agencies.

Both borrowers and lenders understood that the goal of the program as enacted by Congress was to encourage small businesses to retain their employees in order to avoid sending millions of workers to unemployment lines because of circumstances related to the pandemic which were beyond their control. With this goal in mind, the certification was intended to permit a borrower to self-assess its need for a PPP loan based on the economic uncertainty it was aware of *at the time of its loan application*. With no way to predict how long business closures would last or quantify potential losses their business might suffer, borrowers were directed to make their own good faith determination whether the loan was necessary to maintain operations and continue paying their employees, rather than take the precautionary steps that the uncertain circumstances may have otherwise encouraged them do, such as furloughing employees.

### *Policy Concerns with the Questionnaires—Misplaced Timing & Reliance on Data Unrelated to Program Requirements*

While subsequent agency guidance as far back as April announced the agencies’ intent to conduct automatic reviews on all loans \$2 million and greater, neither borrowers nor lenders could have anticipated the approach now laid out in the Loan Necessity Questionnaires.

Language included on the forms notifies lenders and borrowers that the “information collected will be used to inform SBA’s review of [the borrower’s] good faith certification” described above. The form goes on to specify that “Failure to complete the form and provide the required supporting documents may result in SBA’s determination” that the PPP loan, the loan amount, or any applicable forgiveness is “ineligible.” While the questionnaire states that receiving “this form does not mean that SBA is challenging that certification,” the types of questions included and the implications that can be drawn from them raise concerns regarding the potential direction of an agency review.

The questionnaire presents two fundamental policy concerns: a focus on the wrong timeframe during which need for the PPP loan must be assessed and an apparent reliance on assessing the good faith certification based on information unrelated to what the borrower was asked to consider. The questionnaire requests metrics, narratives, and documentation that all paint a picture of whether the borrower has been successful or has been struggling throughout the pandemic. Specifically, questions seek gross revenue comparisons between 2020Q2 and 2019Q2, specific start and end dates

of any state or local shutdown orders that have occurred during the pandemic, any cash outlays for any business alterations due to closures since March, and a detailed assessment of a borrower's financial standing since March through current bank statements and other data. These questions focus on the wrong timeframe. The borrower was asked to certify in good faith that economic uncertainty made the loan necessary *at the time of the borrower's application for the loan*. The law required that the borrower self-assess to the best of its ability with the information it had *at the time*. Any circumstances that happened after the certification was made and throughout the pandemic should have no bearing on evaluating the borrower's good faith statement at the time it made the certification.

In addition, questions regarding current liquidity information and revenue data during the weeks and months after the good faith attestation of need require reporting outside the scope of evaluating a borrower's attestation. We are also surprised at inquiries that could veer into the personal finances of small business owners, even seeking exact dollar amounts of all cash on hand with supporting documentation. The CARES Act did not include a means-based test, revenue reduction test, liquidity test, or any other metric to assess financial standing in order to assign prioritization of PPP loans to certain borrowers over others. To the contrary, Congress explicitly directed that the requirement in other SBA loan programs that the borrower be unable to obtain credit elsewhere shall not apply to PPP loans. While Congress has since introduced numerous legislative proposals that could introduce liquidity or revenue-based assessments in a future extension or second round of PPP lending, per the existing statute those considerations are inapplicable and inappropriate as it relates to the forgiveness of any currently outstanding PPP loan.

Requiring submission of revenue and liquidity data appears to signal a bias against PPP borrowers that managed to survive or remain profitable despite the COVID-19 pandemic. For many borrowers, it was the PPP loan that provided the means by which they could withstand the economic uncertainty they were facing. PPP loan requirements directed PPP borrowers to use the majority of loan funds to keep employees on their payrolls, giving them the ability to direct other available liquidity or revenue to other aspects of the ongoing operations of their business. If a PPP borrower emerges from the pandemic reporting steady or increased revenue with healthy liquidity and continuing employment, for that borrower and its employees, the program was successful in meeting its goal to help sustain the economy. We are worried that the questionnaire implies conclusions in the opposite direction.

There are other elements of the questionnaire that require data that should not have any bearing on evaluating a borrower's good-faith attestation of uncertain economic conditions that necessitate a PPP loan to maintain operations, and we are concerned that the borrower's answers may lead to a misinformed analysis by the agencies. Some of these examples include statements that focus on whether closures or changes in operations were either mandatory or voluntary, and details on which governmental jurisdiction mandated the closures. These and many others should not correlate to a borrower's up-front attestation of need for a PPP loan. And most concerning, there has not been any direction or explanation of how the answers to any of the questions will be viewed or interpreted by SBA.

#### *Process Burden on Borrowers & Lenders*

Both borrowers and lenders also have concerns relating to the burden the new review process presents. Based on instructions compiled from the questionnaires and a SBA letter to lenders transmitted through the PPP Loan Forgiveness Portal, program participants learn that: lenders have 5 days from receipt of the letter to notify borrowers of SBA's new review process, including the

obligation to complete the questionnaire; borrowers have 10 days from the time of receipt of notice from the lender to complete the questionnaire; and lenders then have 5 days after receiving the completed forms to upload them to the PPP Forgiveness Platform “and separately input [borrower] responses to each question into the web form available in the platform.” These deadlines are impractical and compliance by borrowers and lenders would be virtually impossible in most cases. The nine-page questionnaire demands a level and type of reporting never previously required from borrowers by statute or in any process in PPP lending thus far. Based on conversations with PPP borrowers, we believe the agencies’ estimate that borrowers would need 90 minutes to complete the paperwork substantially understates the actual burden presented by the forms.

Furthermore, the SBA letter to lenders referenced above informs lenders of additional borrower and lender documentation requirements which are not disclosed on the questionnaire and must also be submitted to SBA. Of note, the lender is asked to provide a written notice to the borrower requiring the borrower to submit to the lender documentation that the original Forgiveness Application characterized as “Documentation that Each Borrower Must Maintain but is Not Required to Submit.” Borrowers and lenders were not aware until now that this extensive document production must be submitted to the agency, further increasing the paperwork burden on borrowers and lenders.

Reliance on lenders to perform these new functions raises liability concerns regarding any errors made when entering information and also where lenders would stand if a borrower refuses to complete the questionnaire. Private-sector lending partners want to continue to be helpful and ultimately support borrowers, but this new process places them in the uncomfortable position of trying to help their customers through a process that they themselves do not understand.

#### *Recommendation for an Appropriate Approach*

If the agencies want to inquire further into the necessity or suitability of a PPP loan for certain categories of eligible small businesses, we recommend that a better approach would be to ask the borrower to provide a narrative statement with any documentation the borrower believes appropriate to support the basis for its good faith certification that the uncertainty in economic conditions made the PPP loan necessary to support the ongoing operations of the business. This approach would satisfy commitments made by the agencies to review certain loans beyond the Forgiveness Application, but would not impose major changes to PPP criteria in an after the fact manner that could penalize small businesses that played by the rules. Most importantly, this simple, understandable narrative format would honor what was required of borrowers by the CARES Act.

We would also recommend that Congress encourage the agencies to temporarily suspend use of these questionnaires while we collectively address these issues and work together toward a better solution. This seems especially helpful considering that SBA is currently soliciting public comment through November 25 to determine “whether the collection of information is necessary,”<sup>2</sup> and the best approach to do so if deemed necessary. A temporary suspension could help avoid increasing borrower and lender confusion and concern as they attempt to comply with the process while simultaneously providing feedback on it. This action should fit well within SBA’s existing plans to be responsive to stakeholder feedback collected during the comment period.

---

<sup>2</sup> <https://www.federalregister.gov/documents/2020/10/26/2020-23594/reporting-and-recordkeeping-requirements-under-omb-review#h-8>

Please be aware that we are concurrently communicating these recommendations to the agencies.

As the organizations that represent millions of PPP participants who want to see this critical program succeed, we have very real concerns that the PPP would not serve America's needs in the way that was envisioned if the issues related to these questionnaires are not addressed. Going forward, with respect to any proposal to extend PPP lending or establish a similar program, our members are worried that these new agency review procedures could chill the appetites of small businesses and lenders to participate, an outcome that we all would like to avoid.

We urge you to work with the agencies to promptly address the issues that we have identified related to the Loan Necessity Questionnaire process without waiting for legislative negotiations regarding any potential new recovery package. We appreciate the critical and monumental role that both Congress and the agencies play in implementing and overseeing PPP lending, and our organizations and the members that we represent look forward to working with you and the agencies to address these issues.

Sincerely,

American Bakers Association  
American Bankers Association  
American Council of Engineering Companies  
American Financial Services Association  
American Frozen Food Institute  
American Hotel & Lodging Association  
American International Automobile Dealers Association  
American Lighting Association  
American Mold Builders Association  
American Road & Transportation Builders Association  
American Society of Association Executives  
American Staffing Association  
America's SBDC  
Asian American Hotel Owners Association  
Associated Builders and Contractors  
Associated Equipment Distributors  
Associated General Contractors of America  
Association of International Certified Professional Accountants  
Bank Policy Institute  
Community Development Bankers Association  
Construction Industry Round Table  
Consumer Bankers Association  
Convenience Distribution Association  
Credit Union National Association  
Farm Credit Council  
Financial Executives International  
Foodservice Equipment Distributors Association  
Gases and Welding Distributors Association  
Glass Packaging Institute

Global Business Travel Association  
Heating, Air-conditioning & Refrigeration Distributors International  
Independent Community Bankers of America  
Independent Electrical Contractors  
Independent Insurance Agents & Brokers of America  
Industrial Fasteners Institute  
Institute of Scrap Recycling Industries, Inc.  
International Association of Movers  
International Council of Shopping Centers  
International Dairy Foods Association  
International Foodservice Distributors Association  
International Franchise Association  
National Association of Federally-Insured Credit Unions  
National Association of Government Guaranteed Lenders  
National Association of Home Builders  
National Association of Manufacturers  
National Association of Wholesaler-Distributors  
National Bankers Association  
National Community Pharmacists Association  
National Cooperative Business Association CLUSA  
National Council of Farmer Cooperatives  
National Electrical Contractors Association  
National Fastener Distributors Association  
National Funeral Directors Association  
National Marine Distributors Association, Inc.  
National Marine Manufacturers Association  
National Mining Association  
National Ready Mixed Concrete Association  
National Restaurant Association  
National Roofing Contractors Association  
National Small Business Association  
National Tooling and Machining Association  
National Wild Turkey Federation  
NFIB  
North American Association of Food Equipment Manufacturers  
North American Die Casting Association  
Outdoor Power Equipment and Engine Service Association, Inc.  
Precision Machined Products Association  
Precision Metalforming Association  
Professional Beauty Association  
Project Management Institute  
S Corporation Association  
Small Business & Entrepreneurship Council  
Small Business Investor Alliance  
Society of Collision Repair Specialists  
Southeastern Lumber Manufacturers Association  
Specialty Equipment Market Association  
The Metals Service Center Institute  
Tile Roofing Industry Alliance

Tire Industry Association  
U.S. Chamber of Commerce

cc:

The Honorable Sherrod Brown  
The Honorable Ben Cardin  
The Honorable Steve Chabot  
The Honorable Mike Crapo  
The Honorable Patrick McHenry  
The Honorable Marco Rubio  
The Honorable Nydia Velázquez  
The Honorable Maxine Waters