



July 12, 2023

The Honorable Patty Murray
Chair
Committee on Appropriations
United States Senate
Washington, DC 20510

The Honorable Susan Collins
Vice Chair
Committee on Appropriations
United States Senate
Washington, DC 20510

Dear Chair Murray and Vice Chair Collins:

As the Committee prepares to mark up the Fiscal Year 2024 Financial Services and General Government Appropriations bill, the U.S. Chamber of Commerce supports full funding for the Office of the Intellectual Property Enforcement Coordinator, the Small Business Administration (SBA) and its affiliated programs, and for the Office of State Trade and Export Promotion. Chamber members also support strengthening Federal information networks and the Technology Modernization Fund as cyber threats are on the rise and could negatively impact government information systems. Accordingly, we urge you to consider the following funding and policy recommendations.

Office of the Intellectual Property Enforcement Coordinator (IPEC): The Chamber supports full funding for dedicated, full-time staff to assist the IPEC in fulfilling its mission of improving government agency efficiencies and coordination and supporting private sector initiatives to combat intellectual property theft and counterfeiting of domestic products. We strongly support IPEC's work to promote voluntary, stakeholder-driven initiatives to deprive piracy services of revenue from legitimate payment processors and advertising networks. The Chamber supports IPEC's mission to focus on engaging hosting entities such as registries and registrars to combat piracy. In addition, IPEC should work to ensure that U.S. companies that provide hosting and analogous services work proactively and effectively so that their legitimate services are not manipulated to facilitate the theft of American copyrighted works.

Small Business Administration (SBA): The Chamber strongly supports ensuring that small business have access to the SBA 7(a) lending program. We support the authorized level of loan guarantees so that entrepreneurs can expand their operations or acquire a new business. SBA 7(a) loan packages have a strong record of working directly with banks, credit unions and other lenders that partner with the SBA. Continuing this access to capital for small business can help small businesses grow, and thereby growing the economy, and create more jobs.

Technology Modernization Fund (TMF): The Chamber supports full funding for the Technology Modernization fund, as authorized by the Modernizing Government Technology (MGT) Act. Federal agencies spend 80% of their total information technology (IT) budgets on maintaining aging, insecure, and expensive legacy systems. Among other things, the TMF will help the federal government improve the cybersecurity posture of its networks and information systems.

Internal Revenue Service (IRS) Business System Modernization: The Chamber supports full funding for Business System Modernization to update an outdated IRS legacy system and improve IRS Web applications and assisting taxpayers in filing tax documents. An investment in Business System Modernization will help protect the agency from increasing numbers of cyber-attacks. The Chamber also

supports the inclusion of provisions to prevent the IRS from modifying the standards regulating 501(c)(4) political activities.

Securities and Exchange Commission (SEC): The Chamber strongly supports prohibiting the Securities and Exchange Commission (SEC) from considering a rulemaking petition on political spending disclosures. Electioneering activities that are the subject of such a rulemaking petition are already disclosed under election law, and such a petition is outside the authority of the SEC. Furthermore, shareholders have routinely rejected these disclosures when they have been proposed by shareholder resolution.

The Chamber also supports preventing the SEC from finalizing its proposed rulemaking entitled “Open-End Fund Liquidity Risk Management Programs and Swing Pricing; Form N-PORT Reporting” from taking effect. The Chamber has previously encouraged the SEC to withdraw the proposal in its entirety to consider whether any changes are necessary or appropriate and in the public interest. Relatedly, the Chamber appreciates the inclusion of provisions to prevent the SEC from finalizing its rulemaking entitled “Safeguarding Advisory Client Assets,” which the Chamber has also encouraged the SEC to withdraw while it develops a more practical update of custody rules.

Further, the Chamber appreciates and supports the provision to prevent forcing privately held companies into the public markets through changes to the 12(g) “held of record” definition of the Securities Exchange Act of 1934. While public companies are a key component of the success of the American economy, companies should only go public at their own discretion, not through government edict.

Financial Stability Oversight Council (FSOC) and Office of Financial Research (OFR): The Chamber appreciates the inclusion of provisions to require the Office of Financial Stability and the OFR to report to Congress quarterly on their activities and to testify when required. This additional oversight from Congress is especially important given FSOC recently proposed material changes to the process and standards for considering if a nonbank is “systemically important.”

Consumer Financial Protection Bureau (CFPB): The Chamber appreciates the inclusion of provisions that would bring the CFPB under the appropriations process. The agency, especially under its current leadership, has acted without transparency and accountability to Congress.

We thank the Committee for providing the federal agencies with the resources needed to assist consumers, ensure the integrity of our markets, and support small businesses. The Chamber appreciates your consideration of these recommendations as you prepare to mark up the Fiscal Year 2024 Financial Services and General Government Appropriations bill.

Sincerely,



Neil L. Bradley
Executive Vice President, Chief Policy Officer,
and Head of Strategic Advocacy
U.S. Chamber of Commerce

cc: Members of the Senate Committee on Appropriations