As of: 11/13/17 2:51 PM
Received: November 08, 2017
Status: Posted
Posted: November 13, 2017
Tracking No. 1k1-8zoh-hgaq
Comments Due: January 09, 2018
Submission Type: Web

PUBLIC SUBMISSION

Docket: MSHA-2014-0031
Exposure of Underground Miners to Diesel Exhaust

Comment On: MSHA-2014-0031-0076
Exposure of Underground Miners to Diesel Exhaust: Request for Information; Reopening of Rulemaking Record; Extension of Comment Period

Document: MSHA-2014-0031-0104
Comment from T T, NA

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General Comment

How might we put regulatory costs in perspective since costs are not truly measurable? The Commerce Department's Bureau of Economic Analysis in December 2014 estimated a 2014 GDP of $17.6 trillion. The regulatory cost of $1.88 trillion is equivalent to around 11% of that. look at regulation in comparison to the size of the federal government itself. In FY 2014, the US federal government posted a deficit of $482 billion on $3.504 trillion in total spending outlays. One could envision regulations as a form of off-budget spending in the sense that they represent costs of federal requirements the population is compelled to bear. For that perspective we seek, note that our placeholder for estimated regulatory costs approaching $2 trillion is equivalent to more than half the 2014 level of fiscal budget outlays ($3.5 trillion), and nearly four times the $482 billion deficit. Regulatory costs also easily exceed the cost of individual income taxes and vastly outstrip revenue from corporate taxes. Regulatory costs now tower over the estimated 2014 individual income-tax revenues of $1.386 trillion. Corporate income taxes, estimated at $333 billion in 2014, are dwarfed by regulatory costs.6 Regulatory costs also rival the level of pre-tax corporate profits, which were $2.235 trillion in 2013. US regulatory costs surpass the 2013 GDPs of both our neighbors: Canada's stood at $1.827 trillion, and Mexico's at $1.261 trillion according to the World Bank (2014). there are only nine countries whose GDP exceeds the cost of regulation in the United States. US regulatory costs of $1.88 trillion were a "country", it would be the world's tenth largest economy, between India and the Russian Federation.

Regulation's impact on families When a business pays taxes, part of those costs get passed along to consumers in prices, or indirectly in lost output and generally diminished wealth. Like the taxes they are required to pay, businesses will pass some regulatory costs on to consumers. Regulatory costs will be borne by businesses of various types, households, lower level governments, and so forth in direct pass-downs and in broader indirect economic drag. The "incidence" for households, or how much of the American family household budget is "absorbed" by regulatory costs is impossible to say. Businesses bear the brunt . It is worth emphasizing that all regulatory costs areand can only be borne by individuals, as consumers, as workers, as stockholders, as owners or as taxpayers. In other words, the distinction between "business" and "individuals" focuses on the compliance responsibility, fully recognizing that ultimately all costs must fall on individuals. Regulatory costs propagate through an economy, but the ultimate economic unit remains the individual. Just for perspective, were we to assume full passthrough of all such costs to consumers, we can look at the "share" of each household's regulatory costs and compare it with total annual expenditures as compiled by the Bureau of Labor Statistics For America's if one were to imagine allocating annual regulatory costs directly to individuals and assume full pass-through of costs to them, US households "pay" $14,976 annually in hidden regulatory tax ($1.882 trillion in regulation 125.67 million "consumer units"), "equivalent" to 23% of average income before taxes. That figure is higher than every annual household budgetary expenditure item except housing. The implication is that regulation has large societal wealth impacts. More is "spent", so to speak, on embedded or hidden regulation in society than on health care, food, transportation, entertainment, apparel and services, and savings. Societal regulatory costs amount to 29% of the typical household's expenditure budget.

END OR REPEAL THE independent Consumer Financial Protection Bureau created by Dodd-Frank, the concern goes well beyond lack of regulatory review : there exists a fundamental lack of accountability, either executive or legislative or judicial, since the President cannot remove the director, and since Congress does not fund the self-financing agency. Congress lacks even the necessary "power of the purse" to ensure even an appearance of accountability to voters. End Carbon Trading would help all America. End this Mandate on Business.