



Serving the Vending, Coffee Service and Foodservice Management Industries

March 11, 2013

The Honorable Sam Graves
Chairman, Committee on Small Business
United States House of Representatives
2361 Rayburn House Office Building
Washington, DC 20515-6315

RE: Regulatory Flexibility Act (RFA)

Dear Chairman Graves,

It has recently been brought to my attention that the Committee on Small Business Subcommittee on Investigations, Oversight and Regulations will be conducting a hearing on March 14, 2013 to examine agency compliance with the Regulatory Flexibility Act (RFA) and to highlight issues to be addressed through future congressional activity. On behalf of the National Automatic Merchandising Association (NAMA), I would like to submit this letter for the hearing record.

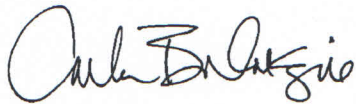
As you may be aware, NAMA is the leading voice of the \$42 billion vending and refreshment services industry. Founded in 1936, NAMA is comprised of over 1,700 industry suppliers, operators, equipment manufacturers and service providers, including many of the world's most recognized brands. The vending and refreshment services industry provides jobs for more than 700,000 hardworking Americans. NAMA members also include many small, multi-generational family-owned businesses, with three or fewer employees.

Due to the large number of these small enterprises, it is important for the federal government to apply principles of flexibility and awareness when issuing regulations that affect our industry. The RFA provides this flexibility and awareness by requiring agencies to consider the impact of their regulatory proposals, and to analyze alternatives that minimize the impact of regulations on small business. Also, by allowing public comment, small business people are given the opportunity for input regarding the effects the proposed regulations could have on their operations.

Our industry is appreciative of the RFA's recognition that small businesses have needs that may be different from larger business entities. We believe that it has led to greater sensitivity to small businesses when drafting proposed regulations. For example, in recent comments to the Food and Drug Administration (FDA) regarding proposed rules for calorie disclosure on vending machines, NAMA strongly supported the FDA's attempt to allow maximum flexibility in how disclosure can take place, and the Agency's attempt to minimize the economic impact to small businesses.

Thank you for allowing NAMA the opportunity to provide our input on the importance of RFA, specifically with regard to our small business members. We look forward to working with the Committee and federal agencies to promote the specific needs of small businesses within the vending and refreshment services industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Carla Balakgie". The signature is fluid and cursive, with the first name "Carla" being more prominent than the last name "Balakgie".

Carla Balakgie, FASAE, CAE
President and CEO
NAMA