



Idaho Farm Bureau Federation

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Submitted via email at: brian.oakey@isda.idaho.gov

July 7, 2020

Mr. Oakey:

On behalf of the more than 80,000 Idaho families who are members of the Idaho Farm Bureau (IFBF), I am writing to provide comments on the proposed fee increases for ISDA's Bureau of Weights & Measures (W&M).

IFBF appreciates the information that has been presented by ISDA on this subject. We recognize the challenges that W&M is working under. However, many questions remain unanswered.

Since the mission of W&M is primarily consumer protection against fraudulently measured products sold by unscrupulous vendors, the W&M budget should be primarily general fund dollars. Despite the Governor's direction to shift fee-based programs to dedicated funds, we do not believe this program fits that criteria as its primary purpose is broad-based consumer protection. If anything, the percentage of budget coming from general funds should be enhanced, not cut. Therefore, our members would not support a W&M budget that contains less than the current percentage of general fund dollars (56%) and would prefer it to be much higher recognizing that the general public is the beneficiary of the program.

Our members fully understand that to have a functioning program, W&M must set-aside funding each year in anticipation of purchasing new equipment to replace that which is worn-out and no longer serviceable. What we don't understand is the purported need to replace very expensive scale inspection trucks simply because they are approaching 20 years old. It would be difficult to locate any farm in Idaho that does not have at least one piece of equipment that is more than 20 years old, and most farms will have several that are still functioning well and getting the job done.

Typically, a vehicle's useful life is determined by mileage, not years of service. It is difficult to imagine that these scale trucks travel very many miles each year during their circuit of inspections. Despite inquiries last year and this year, no information has been presented detailing miles driven or mounting repair costs for these trucks. Furthermore, as farmers well know, heavy trucks can have both the engine and transmission rebuilt when necessary, for far less than the cost of a new vehicle, which will render them serviceable for many additional years. We cannot justify the necessity of replacing these very expensive vehicles just by age without any further information upon which to inform the decision.

In addition, our members believe that the mission and workload of W&M should be carefully reviewed. Why is W&M investigating some of the types of complaints it has detailed as a part of its services? It is our understanding that W&M has been responding to complaints from consumers that cash registers are ringing-up items at a different price than is posted on the shelf. Other complaints W&M responded to involve fuel quality rather than quantity. Why are either of these issues considered an appropriate duty or function of W&M? W&M does not even regulate these types of issues.

We believe there are other agencies better suited to respond to these complaints which will free-up additional time for W&M to focus on their core mission of inspecting measuring devices for the protection of consumers across the state. A refocusing of mission and duties of personnel will help reduce expenditures and tighten the belt of W&M similar to every other agency during this time of economic downturn.

Finally, the proposal represents a HUGE increase (over 77%) in budget in one year. If this magnitude of increase is truly necessary, it makes far more sense to reduce the shock on those paying the fees to phase-in the increase over a number of years; we would suggest a minimum of five years. If ISDA does not believe it is feasible to phase in a nearly 80% increase by increasing fees incrementally every year for five years, then we alternatively suggest increasing fees every-other year over six years.

However, based upon our comments above, we do not believe this level of increase is necessary. By ensuring the general fund portion of the budget is kept above 56%, by ensuring equipment is utilized to its full useful lifetime, and by refocusing the mission and prioritizing workload on core, essential services, W&M can conceivably be fully funded with far less than a 77% increase.

Thank you for the opportunity to comment on this important issue. If you have any questions about these comments, please contact Russ Hendricks in our Boise office at 208-342-2688.

Sincerely,



Bryan Searle, President

CC: Senator Jim Guthrie, Chairman, Senate Agricultural Affairs Committee
Senator Lori Den Hartog, Vice-chair, Senate Agricultural Affairs Committee
Representative Judy Boyle, Chairman, House Agricultural Affairs Committee
Representative Caroline Nilsson Troy, Vice-chair, House Agricultural Affairs Committee
Alex Adams, Administrator, Division of Financial Management
Sam Eaton, Office of Governor Brad Little