
From: Tina Desuacido [tina500@juno.com]
Sent: Monday, March 14, 2011 9:19 AM
To: ERBtestimony
Subject: Tax Foundation Testimony
Attachments: s0753e11.pdf

TRANSMISSION OF TESTIMONY

DATE: Monday, March 14, 2011

TO: House Committee on Commerce & Consumer Affairs

FROM: Tax Foundation of Hawaii

Total Pages 3

FOR: Rep. Angus McKelvey, Chair

Testifier: Lowell L. Kalapa, President - Tax Foundation of Hawaii

(Mr. Kalapa will not appear in person at the hearing.)

Date of Hearing - Tuesday, March 15, 2011

Position: Comments

Time of Hearing - 8:00 am

SB 753, SD-2 - Relating to High Technology (3 pages)

Number of copies - 4

Thank you.

TAXBILLSERVICE

126 Queen Street, Suite 304

TAX FOUNDATION OF HAWAII

Honolulu, Hawaii 96813 Tel. 536-4587

SUBJECT: INCOME, Extend tax credit for research activities

BILL NUMBER: SB 753, SD-2

INTRODUCED BY: Senate Committee on Ways and Means

BRIEF SUMMARY: Amends HRS section 235-110.91 to require a qualified high technology business that claims the credit under this section to complete and file with the director of taxation, through the department website, an annual survey on electronic forms prepared and prescribed by the department. Requires the survey to be filed before June 30 of each year following the calendar year in which the credit may be claimed under this section.

The survey shall include: (1) identification of the industry sector in which the qualified high technology business conducts business; (2) qualified expenditures; (3) revenue and expense data; (4) Hawaii employment and wage data including the number of full and part-time employees retained, new jobs, temporary positions, external services procured by the business, and payroll taxes; and (5) filed intellectual property, including invention disclosures, provisional patents, and patents issued or granted.

The department of taxation shall use this information to prepare summary descriptive statistics by category. The information shall be reported at the aggregate level to prevent compromising identities of qualified high technology business investors or other confidential information. The department shall also identify each qualified high technology business that is the beneficiary of tax credits claimed under this section. The department shall report the information required under this subsection to the legislature by September 1 of each year.

Requires the department to use the information collected to study the effectiveness of the tax credit under this section. The department shall report on the amount of tax credits claimed and total taxes paid by qualified high technology businesses, the number of qualified high technology businesses in each industry sector, jobs created, external services and materials procured by the businesses, compensation levels, qualified research activities, and other factors as the department determines. The department shall report the results of its study to the legislature by December 1 of each year.

Amends the definition of "qualified high technology business" to mean a business that conducts more than ___% of its activities in qualified research.

Extends the expiration date of the tax credit for research activities from December 31, 2010 to December 31, 2015.

EFFECTIVE DATE: July 1, 2010; applicable to tax years beginning after December 31, 2010

STAFF COMMENTS: The legislature by Act 178, SLH 1999, and Act 221, SLH 2001, enacted various tax incentives to encourage the development of high technology businesses in the state. These acts provided

investment and research credits, as well as income exclusions, providing tax incentives to encourage high tech businesses and individuals associated with high tech businesses to locate in the state. This measure adds extensive information reporting requirements and extends the expiration of the tax credit from December 31, 2010 to December 31, 2015. While the adoption of this measure would allow the department of taxation to ascertain the effectiveness of the tax credit for research activities, such a review should have been performed a few years after the credit had been adopted.

While the proposed measure would also extend the credit for research activities until December 31, 2015, it would perpetuate the drain on state funds. It should also be remembered that the research credit is a refundable tax credit. Thus, should the amount of the credit exceed the taxpayer's income tax liability, any excess credit is a cash payment out of the state treasury to the claimant.

While the focus on high technology in the last few years is commendable, it fails to recognize that investments are made with the prospect that the venture will yield a profit. If the prospects for making a profit are absent, no amount of tax credits will attract investment from outside Hawaii's capital short environment. People do not invest to lose money. It should be remembered that until Hawaii's high cost of living can be addressed, all the tax incentives in the world will not make a difference in attracting new investment to Hawaii. The only attractive aspect for resident investors to plough money into such activities is the fact that the credit provides a way to avoid paying state taxes.

A former Hawaii resident who has been a success in the field of high technology pointed out recently what will make Hawaii conducive to high tech businesses and they are: (1) entrepreneurs, not capital, that comes first; (2) entrepreneurs coming from engineering schools and technology companies; (3) building a world class engineering school in Hawaii; (4) supporting internships at technology companies; (5) allowing our best children to go away to get a worldwide perspective; (6) not broadband passing through Hawaii that is a selling point; (7) that people fly direct and therefore is Hawaii's location in the middle of the Pacific an advantage?; (8) learning the rules of the game; (9) looking at Israel and learning from them; and (10) doing your own thing, being a copy cat does not work. At the heart of his remarks was the fact that in order to produce a high technology industry in Hawaii, those companies need to have access to institutions of higher education that are producing the people needed by the high technology industry. Without the academic synergy, Hawaii will never become a center for high technology activity. Thus, all of the tax incentives, like this measure embodies, will fall short of luring high technology firms to Hawaii.

Further, the tremendous tax burden, the draconian regulatory environment, and the dramatic increase in fees that go with the permitting process make Hawaii an unattractive place to do business. It should be remembered that while the high technology credits may look like a good incentive or enticement to undertake research activities in Hawaii, those who would conduct this research must live in the same high cost-of-living environment with which other taxpayers continue to struggle. Thus, the cost of maintaining those researchers will be higher than to do so where the cost of living is much lower. Let's not bet the farm on high technology without really understanding what makes this industry tick.

Obviously the authors of this proposal would like to ignore the evaluation of these tax incentives done by UHERO a few years ago which basically condemned the credits as a waste of state resources as there is little evidence that the current program of tax credits has created substantial new employment or on-going enterprises. It is truly amazing that given the dire condition of the state's financial condition that lawmakers would continue to support unbridled drains of resources while at the same time proposing

that the tax burden be increased on all other taxpayers. With declining revenues, every program from education to corrections to health services will be severely curtailed. If the state doesn't have the money to put textbooks in the schools why then do we need the highly touted, high-paying jobs the advocates for the industry promise? The next generation may not even know how to read given the cuts to the education budget.

Again, lawmakers must ask themselves whether or not this incentive is appropriate in these dire financial times. Given that there are many other proposals in the legislature to hike tax rates for either the general excise or net income taxes, taxpayers will find the continuance of these targeted business tax credits frightening. Frightening because these very lawmakers are supposed to represent the best interest of their constituents. Raising taxes on constituents while still handing out money to favored groups will engender the ire of constituents. The finger of blame for these potential increases in tax burden should not stop at lawmakers, but be placed squarely on those in the community who continue to push for these targeted tax credits. Perhaps those proponents should be asked to pick up the tab for this reckless expenditure of precious tax dollars.

While it is gratifying to know that lawmakers have finally realized that they need to evaluate the effectiveness of some of these tax incentives, it comes a tad late, but better later than never. What is appalling is that lawmakers wish to continue the credit for another five years before the evaluation is made. So no matter what the evaluation finds, the credit will go on without further review. Rather than extending it for an irrelevant period of time, the extension should be made co-terminus with the submission of the study so that policymakers can have the evaluation and recommendations before them before they decide the fate of the credit.

Finally, it should be noted that this state credit basically tracks the federal tax credit for research activities, including the disqualification for the credit should any part of the cost of the research be supported by federal grants. It would be interesting how many of the claims for this state research credit were disqualified because all or a part of the research activities were paid for with funds from federal grants.

Digested 3/14/11

**Testimony to the House Committee on Economic Revitalization & Business
Tuesday, March 15, 2011**

8:00 a.m.

State Capitol - Conference Room 312

RE: SENATE BILL NO. 753 SD2 RELATING TO HIGH TECHNOLOGY

Chair McKelvey, Vice Chair Choy, and members of the committee:

The Chamber of Commerce of Hawaii ("The Chamber") **strongly supports** SB 753 SD2 relating to High Technology, **with amendments**.

The Chamber is the largest business organization in Hawaii, representing more than 1,100 businesses. Approximately 80% of our members are small businesses with less than 20 employees. As the "Voice of Business" in Hawaii, the organization works on behalf of its members, which employ more than 200,000 individuals, to improve the state's economic climate and to foster positive action on issues of common concern.

This bill extends the research and development (R&D) tax credit to 2015 and adds reporting requirements to measure the effectiveness of the tax credit for research activities.

While technically referred to as a "tax credit", this credit could be viewed as a sound state "investment" that has the proven potential to diversify the economy exponentially and create meaningful careers in skilled, technical and manufacturing jobs. For example, the success of Digital Island and, more recently, Sopogy, Inc are major examples of Hawaii's proven capabilities.

This is a prime opportunity to promote the R&D sector in our state and support our small local companies in the R&D industry so that it can continue to flourish. This will allow them to provide jobs for our talented citizens and ensure that our keiki has a viable option to move back or stay in Hawaii and obtain quality jobs. Furthermore, this measure will strengthen the industry's effort to compete with other players in the national and international arena.

Finally, supporting the R&D industry will help broaden and diversify Hawaii's economic base by spurring spin-off activities resulting from successful innovations. This would include production and manufacturing businesses that would further expand business activity and create skilled jobs outside the service and retail sectors.

We believe this measure will create and retain jobs while increasing the state's revenues as the credit will turn a positive return on investment for the State.

Proposed Amendments to SB 753

In order to sustain and maximize the outcome of this credit to benefit Hawaii's economy, the Chamber respectfully requests that the committee amends the bill, to:

Page 9: SECTION 2 (j) (5), lines 3-5

- Proposed amendment: *Remove* "invention disclosures" (lines 3-4)
 - Justification: This would be harder to track consistently when the industry as a whole does not follow this practice, only some companies claim to track this.
- Proposed amendment: *Change* "Filed intellectual property..., provisional patents, and patents issued or granted" to read: **(5) Patents filed: (a) provisional, (b) full; and patents issued and granted.**
 - Justification: Patents issued/granted happens after the start of the filing process, so if we just track the filed IP metric, we may not be capturing all the near term activities and results.

Page 7: SECTION 2 (f), lines 4-6

- Proposed amendment: *Change* definition of "Qualified high technology business" to:
 - "Qualified high technology business" means a business that conducts more than fifty per cent of its activities in qualified research.
 - "Qualified research" means:
 - (1) The same as in section 41(d) of the Internal Revenue Code;
 - (2) The development and design of computer software for ultimate commercial sale, lease, license or to be otherwise marketed, for economic consideration. With respect to the software's development and design, the business shall have substantial control and retain substantial rights to the resulting intellectual property;
 - (3) Biotechnology;
 - ~~(4) Performing arts products;~~
 - (5) Sensor and optic technologies;
 - (6) Ocean sciences;
 - (7) Astronomy; or
 - (8) Nonfossil fuel energy-related technology

Page 7: SECTION 2(f), line

- Proposed amendment: *Change* back to the original:
 - "Qualified research" under section 41(d)(1) of the Internal Revenue Code shall not include research conducted outside of the State.

Role and Economic Impact of the Research and Development Industry in Hawaii

The large presence of all of the Nation's military services in Hawaii has spurred local companies to form and emerge into this industry. This has served as a source of funding and contracting opportunities for Hawaii's growing R&D sector, and there is considerable opportunity for even greater growth. There are literally millions of dollars that could be directed to Hawaii R&D businesses via military channels and through the prime defense contractors. Furthermore, the presence of a strong R&D community is important and is what helps sustain larger defense contractors in Hawaii.

The Defense and Dual Use industry can and will play a vital role in stabilizing the state's economic climate. One of the best ways for the industry to help is to maintain and grow the workforce. Without job creation, cost cutting and tax increases will only create a downward spiral, requiring more costs and more tax increases. The state must maximize its return by spending money that generates multiples of increased spending, garnering the most return from the least amount of tax dollars.

Research and development is one of those areas. In comparing the R&D tax credit to other credits, we observe that the R&D tax credit is one of the most effective in generating and maintaining jobs per tax dollar, generating higher tax revenues for dollar spent, and stimulating measurably more economic activity in the state per dollar of tax credit.

Additionally, companies leveraging the R&D tax credits tend to be more mature companies; many on the cusp of significant expansion, which will accelerate the hiring of new employees and tax revenue. Research and development is a highly critical component to a sustainable economy. R&D provides well-paying jobs to highly-educated employees. These employees pay significant taxes back to the state and spend considerable amounts of income within the state for goods and services. Furthermore, as the R&D matures it creates product companies that increase the number of jobs and tax base significantly.

Also, the cost of the tax credit helps support qualified expenses in business expenditures in the state. Much of these expenditures come from imported dollars either from outside investors, the federal government or large mainland businesses. These expenditures result in income taxes and significant GET taxes.

R&D tax credit requires a company to expend its funds for which it receives a percentage (has been 20% of wages) of qualified work. This refund occurs after the company files its tax return. So, R&D tax credits for 2011 would not be paid until 2012 and most of the payments will be in the latter half of the year. Therefore, the state receives the benefits of a business base now and doesn't pay for on average 18 months later. The tax is highly focused on wages for research activities. These jobs are typically high paying and result in significant income tax revenues and GET from the money spent by these employees.

While these positive aspects are fairly defined, some have expressed concerns about the competitiveness of Hawaii's R&D tax credit levels and their refundability. However, several factors that are not considered in those concerns include:

1. Comparisons are only made to other states and not to other countries. R&D is becoming an economic driver worldwide and Hawaii companies compete worldwide,
2. The entire cost of doing R&D is the most important factor. Hawaii has a number of competitive disadvantages such as high income tax rates, high cost of living, high unemployment insurance costs, and high transportation costs, and
3. R&D returns are highest when R&D turns into products, resulting in significant growth in job opportunities, increased intellectual property owned by Hawaii residents, and increased travel to the state by customers and technology related conferences.

With the loss of federal support that helped sustain R&D companies in a high-cost environment, the importance of a refundable R&D tax credit is even more prevalent and which will help keep existing businesses viable in Hawaii.

Summary

In summary, the Hawaii R&D tax credit has been effective in generating new taxes, creating new companies and employing a number of residents. Therefore, it is important that a gap does not exist in the R&D tax credit while the 2011 legislature addresses the longer term impact of R&D on the state. Companies need to make long term plans when doing R&D. It is critical to the industry that the tax credit be in place long enough to encourage R&D and its commensurate high paying jobs, job growth, and its direct impact on the sustainability of the state's economy.

Therefore, we respectfully ask that the committee to **pass this measure with the proposed amendments**. Thank you for the opportunity to provide testimony.

Written Statement of

KARL FOOKS

President

Hawaii Strategic Development Corporation

before the

HOUSE COMMITTEE ON ECONOMIC REVITALIZATION AND BUSINESS

March 15, 2011

8:00 AM

State Capitol, Conference Room 312

In consideration of

SB 753 SD2 RELATING TO HIGH TECHNOLOGY

Chair McKelvey, Vice Chair Choy, and Members of the Committee on Economic Revitalization and Business:

The Hawaii Strategic Development Corporation (HSDC) strongly supports SB 753 SD2. This bill reinstates the state tax credit for research activities that sunset at the end of calendar year 2010. This tax credit program was an effective measure to support research and development activities, which in turn, foster and encourage the innovation essential to create high-wage job opportunities in our economy.

Over the past nine years, the tax credit claims under this program averaged approximately \$11 million a year. As the credit can only be claimed for qualified research conducted in Hawaii and only for 20% of the qualified expenditures, the cost of the program is in large part offset by taxes paid on expenditures and payroll, not only on the qualified research activities, but also the broader scope of technology related economic activity supported by the research expenditures.

HSDC recommends the following technical amendments to this bill:

1. Page 7, Line 4 should be changed to:
"Qualified high technology business" means the same as in section 235-7.3, but excluding performing arts products.
2. Page 7, Line 7 should be changed to:
"Qualified research" under section 41(d)(1) of the Internal Revenue Code shall not include research conducted outside of the State.

Thank you for the opportunity to submit testimony on this bill.

Written Statement of

YUKA NAGASHIMA

Executive Director & CEO

High Technology Development Corporation
before the

HOUSE COMMITTEE ON ECONOMIC REVITALIZATION & BUSINESS

March 15, 2011

8:00 AM

State Capitol, Conference Room 312

In consideration of

SB 753 SD2 RELATING TO HIGH TECHNOLOGY.

Chair McKelvey, Vice Chair Choy, and Members of the Committee on Economic Revitalization & Business.

The High Technology Development Corporation (HTDC) supports SB 753 SD2, which reinstates the Research and Development Tax Credit, and offers some suggestions to further improve the bill. This tax credit program was an effective measure to support research and development activities which in turn, foster and encourage the innovation essential to create high-wage job opportunities in our economy. Such initiative is especially prudent now for Hawaii to hang onto the high-wave jobs we have already created, due to the suspension of earmarks as well as the sun setting of Act 221. Just in properties managed by HTDC, the impact of our tenants with respect to the moratorium of earmark is estimated to be \$50M, already forcing those companies to lay off their workers.

This initiative is fiscally conservative with measurable results and predictable budget. Over the past nine years, the tax credit claims under this program averaged approximately \$11 million a year. As the credit can only be claimed for actual expenditures made in Hawaii and only for 20% of the qualified expenditures, the cost of the program is partially offset by taxes paid on expenditures and payroll.

HTDC's recommendations to further improve this important measure are as follows:

1. Remove "Invention disclosures" from the list of reporting requirements, as this process is not consistently practiced within the industry and is an internal process difficult to audit. Many R&D companies may be unfamiliar or confused by the term. While this process is a reflection of R&D activities, it is a poor metric for the State's purpose because it is not consistently practiced among the industry members.
2. Clarify the patent reporting requirements as "Patents filed" (whose category can be subdivided into provisional patents and full patents), and "Patents issued/granted". This

distinction would better capture the vibrant activities of the R&D companies in time, as the patent review process is lengthy and it may be years before a full patent is granted.

3. HTDC also recommends that after the sets of information are collected by DoTAX that DBEDT be given the aggregated, anonymized data for analysis so that DBEDT may provide an appropriate economic impact report to the legislature. Because this is an economic stimulus measure, it is not sufficient for the legislature to know the immediate liabilities to the State. We must also take into account the income, payroll and other taxes these companies must have already paid in order to receive the R&D tax credits. The DBEDT staff is better suited to such analyses, given proper resources, to factor in the economic multipliers and produce impact reports. Doing so will bring further synergy to other reports that DBEDT is already mandated to provide (e.g., emerging industries report, etc.).

Thank you for the opportunity to submit testimony on this bill.



Written Testimony of

James P Karins,
President Pukoa Scientific
before the

**HOUSE COMMITTEE ON ECONOMIC
REVITALIZATION AND BUSINESS
MARCH 15, 2011
8:00 AM
ROOM 312
HAWAII STATE CAPITOL**

RE: SB 753, SD2 RELATING TO HIGH TECHNOLOGY

Chair McKelvey, Vice Chair Choy, and Members of the Committee:

Pukoa Scientific strongly supports this bill. Pukoa Scientific is a small dual-use company located in the Manoa Innovation Center. It has 7 full-time employees working on image processing technologies. Since it was founded in 2004 Pukoa has utilized the R&D tax credit to pursue and win very competitive contracts that otherwise would have been nearly impossible to obtain, to write and file patents for its novel algorithms, and to fund part-time students.

In order to provide improved clarity and to avoid unintended consequences, PukoaScientific requests the committee consider two minor changes to the bill. The first is the definition of QHTB. Since the R&D tax is limited to IRC 41(d) qualified research, the definition of QHTB should remain as defined in HRS 235 110-9 modified by removing performing arts products. Second the reporting requirements should have a minor change. Under intellectual property, "invention disclosure, provisional patents, and patents issued or granted" should be modified to "patents filed: (a) provisional, (b) full; and patents issued and granted."

This bill will create and retain jobs while increasing the state's revenues. We cannot afford to overlook the prime opportunity to promote this growing sector in our state. This is the opportune time to support our small local companies in the R&D industry so that it can continue to flourish and provide jobs for our talented citizens and ensure that our keiki have a viable option to move back or stay in Hawaii and obtain quality jobs. Furthermore, this measure will strengthen the

industry's effort to compete with other players in the national and international arena. Finally, supporting the R&D industry will help broaden and diversify Hawaii's economic base.

Role of the Research and Development Industry in Hawaii

The R&D technology industry can and will play a vital role in stabilizing the state's economic climate. One of the best ways for the industry to help is to maintain and grow the workforce. Without job creation, cost cutting and tax increases will only create a downward spiral, requiring more costs and more tax increases. The state must maximize its return by spending money that generates multiples of increased spending, garnering the most return from the least amount of tax dollars.

Research and development is one of those areas. In comparing the R&D tax credit to other credits, we observe that the R&D tax credit is one of the most effective in generating and maintaining jobs per tax dollar, generating higher tax revenues for dollar spent, and stimulating measurably more economic activity in the state per dollar of tax credit. Additionally, companies leveraging the R&D tax credits tend to be more mature companies; many on the cusp of significant expansion, which will accelerate the hiring of new employees and concomitant tax revenue.

Additionally, research and development is a highly critical component to a sustainable economy. R&D provides well-paying jobs to highly-educated employees. These employees pay significant taxes back to the state and spend considerable amounts of income within the state for goods and services. Additionally, as the R&D matures it creates product companies that increase the number of jobs and tax base significantly.

Some important facts related to R&D tax credits are:

- (1) R&D employees are highly paid and pay income taxes at high rates and generate significant other economic activity within the state. For example, the average salary for technology jobs is \$66,000.
- (2) R&D funds are highly leveraged by imported monies, thus generating more economic activity than economic activities that just move money from one in-state entity to another,
- (3) R&D tax credits are only received after the company has expended the funding, generating tax revenues to the state first,
- (4) R&D tax credits typically go back into additional R&D through additional salaries,

While these positive aspects are fairly defined, some have expressed concerns about the competitiveness of Hawaii's R&D tax credit levels and their refundability. However, several factors that are not considered in those concerns include:

- (1) Comparisons are only made to other states and not to other countries. R&D is becoming an economic driver worldwide and Hawaii companies compete worldwide,
- (2) The entire cost of doing R&D is the most important factor. Hawaii has a number of competitive disadvantages such as high income tax rates, high cost of living, high unemployment insurance costs, and high transportation costs, and

- (3) R&D returns are highest after several years when R&D turns into products, resulting in significant growth in job opportunities, increased intellectual property owned by Hawaii residents, and increased travel to the state by customers and technology related conferences.

Summary

In summary, the Hawaii R&D tax credit has been effective in generating new taxes, creating new companies and employing a number of residents. Therefore, it is important that a gap does not exist in the R&D tax credit while the administration and legislature addresses the longer term impact of R&D on the state. Companies need to make long term plans when doing R&D. It is critical to the industry that the tax credit be in place long enough to encourage R&D and its commensurate high paying jobs, job growth, and its direct impact on the sustainability of the state's economy.

Therefore, we urge the committee to **pass this measure with minor amendments**. Thank you for the opportunity to express our views.



March 14, 2011

TESTIMONY TO THE HOUSE COMMITTEE ON ECONOMIC REVITALIZATION
AND BUSINESS
MARCH 15, 2011
8:00 AM
ROOM 312
HAWAII STATE CAPITOL

RE: SB 753, SD2 RELATING TO HIGH TECHNOLOGY

CORPORATE OFFICE

001 Bishop Street
Suite 2950
Honolulu, Hawaii 96813
08.441.3600
08.441.3601 fax

CALIFORNIA OPERATIONS

2675 Danielson Court
Suite 406
San Jose, California 92064
58.376.0185
58.376.0190 fax

FINANCE OFFICE

001 Bishop Street
Suite 2950
Honolulu, Hawaii 96813
08.441.3600
08.441.3601 fax

Dear Chair McKelvey, Vice Chair Choy and members of the committee:

I am writing to you to express my strong support for SB 753 which seeks to extend for five years the research and development (R&D) tax credit that has proven so successful in the past. This bill is extremely important and affects a large number of individuals and organizations in the State of Hawaii that perform R&D work.

This bill will enable broad sectors of R&D activities in the State to continue by incentivizing this type of work. R&D activities in the State produce the very kinds of jobs that are desired here, high paying technology sector jobs. The type of personnel that perform this kind of activity are also the same entrepreneurs that start additional new companies that ultimately yield even more revenues, jobs and provide tremendous upside potential in Hawaii.

R&D work is critical to the future growth in Hawaii industry and education and should be supported as this bill would do.

Please feel free to contact me at any time if you have other questions or comments.

Sincerely,

Rick E. Holasek, Ph.D.
President and CEO
NovaSol
1001 Bishop Street, Suite 2950
Honolulu, HI 96813
(808) 441-3666
rick@nova-sol.com

From: mailinglist@capitol.hawaii.gov
Sent: Sunday, March 13, 2011 11:45 AM
To: ERBtestimony
Cc: swartzg001@hawaii.rr.com
Subject: Testimony for SB753 on 3/15/2011 8:00:00 AM

Testimony for ERB 3/15/2011 8:00:00 AM SB753

Conference room: 312
Testifier position: oppose
Testifier will be present: No
Submitted by: gregory swartz
Organization: Individual
Address:
Phone:
E-mail: swartzg001@hawaii.rr.com
Submitted on: 3/13/2011

Comments:

The tax credits should not be refundable or transferrable. Moreover, there is no valid business reasons for keeping the identities of tax credit users secret.